

## Sexual Harassment Policy

### Introduction

Creditinfo Group is committed to providing an inclusive, supportive and safe environment for everyone who works here. This policy applies to all employees, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

The aim of the Policy is to prevent, respond to incidents that arise, and take action to effect long-term change by:

- educating all staff about sexual harassment and their role in developing a culture free from harassment;
- fostering a working environment that supports the dignity and respect of all and is free from any form of discrimination, bullying, harassment, and violence, including gender-based violence;
- where harassment does occur, providing a process and procedure for dealing with it to ensure it is properly managed;
- capturing learning from what happened to help create an environment free from harassment;
- monitoring our progress in achieving a workplace free from harassment; and
- building continuous improvement into our culture.

Everyone has a part to play in being aware of, preventing and dealing with sexual harassment. The Policy sets out the expectations for the behaviour of our employees as well as what we can do to protect all employees from sexual harassment. It is supported by the senior leadership within the organisation and they will all be visible champions of this Policy.

We will not tolerate any form of sexual harassment in the workplace, will treat all incidents seriously and promptly investigate all allegations of sexual harassment. There is no time constraint around reporting an incident of sexual harassment under this Policy.

Sexual harassment will be treated as a disciplinary offence. Appropriate disciplinary action, including warnings, [suspension, compulsory transfers/demotions (without protection of wages or salary)], and dismissal with or without notice in accordance with the disciplinary procedure may be taken against any person who violates this Policy. There may also be circumstances where further training is mandated for individuals, teams or the whole organisation.

No one will be victimised for making a complaint of sexual harassment or for helping another person to make such a complaint. This means that anyone who makes such a complaint or who helps someone to make such a complaint, for example by giving evidence or information, will not be treated badly because of their actions. No one will be subject to disciplinary action or to any other detriment simply because their complaint is not upheld.

While this Policy does not form part of any contract of employment or contract to provide services, and may be amended at any time as set out above, all employees

will be made aware of this Policy and will be expected to comply with it. This Policy will be communicated to all staff.

All employees are entitled to be treated with dignity and respect in our place of work. This means freedom from sexual harassment, feeling safe and supported and having access to redress if such behaviour does arise.

Our managers will maintain an open-door policy and we encourage all employees to come forward with any concerns in relation to sexual harassment. All our employees have a responsibility to behave in line with the requirements of this policy.

## **What is Sexual Harassment?**

Sexual harassment is unwanted conduct of a sexual nature which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It also covers treating someone less favourably because they have submitted to, or refused to submit to, unwanted conduct of a sexual nature or in relation to gender reassignment or sex.

Sexual harassment may be committed by a fellow worker, an agent of an organisation, or a third party. It does not need to occur in person. It can occur via digital means, including social media sites or channels (eg WhatsApp). Someone may be sexually harassed even if they were not the target of the behaviour.

## **What is 'unwanted conduct'?**

Unwanted conduct covers a wide range of behaviour which is unwanted or unwelcome. Types of behaviours which constitute sexual harassment include, but are not limited to:

### *Physical conduct:*

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging.
- Fondling, or inappropriate touching.
- Physical violence, including sexual assault and rape.
- The use of job-related threats or rewards to solicit sexual favours

### *Verbal Conduct:*

- Sexual comments or jokes, which may be referred to as "banter"
- Mimicry
- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories, jokes or pranks
- Intrusive questions about a person's private or sex life or a person discussing their own sex life
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending/sharing sexually explicit messages/images (by any medium)
- Coercion
- Gaslighting (a form of covert emotional abuse)

#### Non-Verbal Conduct:

- Display of sexually explicit or suggestive material or imagery
- Graffiti
- Acts affecting a person's surroundings
- Posts or contact on social media
- Sexually suggestive gestures
- Facial expressions
- Whistling
- Leering
- Predatory behaviour

The effect of such behaviour and whether it is unwanted should be considered from the point of view of the person who feels harassed (the "recipient").

#### **What is 'Victimisation'?**

Victimisation is subjecting someone to detriment because they have done, are suspected of doing, or intend to do, an act which is protected under discrimination and harassment laws. These are outlined below. It is not necessary for the person to have done the protected act in order for detrimental treatment to be considered as victimisation.

The protected acts are:

- Making a claim or complaint (eg for discrimination or harassment)
- Helping someone else to make a claim by giving evidence or information in connection with proceedings of harassment
- Making an allegation that someone has breached the Group's policy

Examples of victimisation may include:

- Failing to consider someone for promotion because they have previously made a sexual harassment complaint
- Dismissing someone because they accompanied a colleague to a meeting about a sexual harassment complaint
- Excluding someone from work meetings because they gave evidence as a witness for another employee as part of an employment tribunal claim about harassment.

#### **Circumstances which are covered**

This policy covers behaviour which occurs in the following situations:

- a work situation
- a situation occurring outside of the normal workplace or normal working hours which is related to work, eg a working lunch, a business trip or social functions
- outside of a work situation but involving a colleague or other person connected to the Organisation, including on social media
- against anyone outside of a work situation where the incident is relevant to your suitability to carry out the role.

## **What to do if you are subject to sexual harassment or victimisation**

We are committed to ensuring that there is no sexual harassment or victimisation in our workplace. Allegations of sexual harassment and victimisation will be treated as a disciplinary matter, although every situation will be considered on an individual basis and in accordance with the principles of our disciplinary procedures applicable across the Group. Please refer to your local labour code and /or policies and procedures for guidance on local processes, which should take precedent.

### **Informal complaint**

We recognise that complaints of sexual harassment or victimisation can be of a sensitive or intimate nature and that it may not be appropriate for you to raise the issue through a grievance procedure. In these circumstances, you are encouraged to raise such issues with a senior colleague of your choice (whether or not that person has a direct supervisory responsibility for you) as a confidential helper. This person cannot be the same person who will be responsible for investigating the matter if it becomes a formal complaint.

If you experience sexual harassment and you feel comfortable to do so, you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

In addition, you may also choose to raise concerns during your regular communication with your manager, eg in a one-to-one meeting. Your manager will listen to you and take your concerns seriously if you do this but may encourage you to follow the reporting procedures set out below. If you don't have a one-to-one meeting scheduled with your manager, you can ask to meet with them to discuss any concerns that you may have.

### **Formal complaint**

Where the informal approach fails or if the sexual harassment or victimisation is more serious, you should bring the matter to the attention of your local HR representative or Group Head of HR / Group Legal Counsel as a formal written complaint and again your confidential helper can assist you in this.

If possible, you should keep notes of what happened so that the written complaint can include:

- the name of the alleged harasser
- the nature of the alleged harassment
- the dates and times when the alleged harassment occurred
- the names of any witnesses
- any action already taken by you to stop the alleged harassment.

On receipt of a formal complaint, we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a

temporary transfer of the alleged harasser to another work area or suspension from the workplace until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. The meeting will be held as soon as practically possible, ensuring local labour laws are taken into consideration. You have the right to be accompanied at such a meeting by your confidential helper or another work colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence may be dealt with under relevant disciplinary procedure.

On conclusion of the investigation, the decision of the investigator, detailing the findings, will be sent in writing to you.

You have the right to appeal against the findings of the investigator. If you wish to appeal, you must inform your local HR representative or Group Head of HR / Group Legal Counsel usually within five working days of receiving the outcome. However please ensure you check your own local labour code / speak with your HR representative for timelines, as this may differ within our jurisdiction. You will then be invited to a further meeting. As far as reasonably practicable, the Organisation will be represented by a more senior manager than the manager who attended the first meeting (unless the most senior manager attended that meeting).

Following the appeal meeting, you will be informed of the final decision, which will be confirmed in writing.

Regardless of the outcome of the procedure, we are committed to providing the support you may need. This may involve mediation between you and the other party or some other measure to manage the ongoing working relationship.

You will not be victimised for having brought a complaint.

### **What to do if you witness sexual harassment or victimisation**

If you witness sexual harassment or victimisation, you are encouraged to take appropriate action to address it. You should not take any action that may put you at risk of sexual harassment or other harm. If you feel able, you should intervene to prevent the matter continuing. If you are not able to do this, your action may include offering support to the person who has been sexually harassed and encouraging them to report the incident or reporting the incident yourself.

If reporting the incident, you should bring the matter to the attention of your local HR representative or Group Head of HR / Group Legal Counsel in writing.

Your concerns will be handled by your local HR representative or Group Head of HR / Group Legal Counsel who will sensitively talk to the person subject to sexual harassment to determine how they want the matter to be handled.

### **Third-party sexual harassment**

Third-party sexual harassment occurs when a member of our workforce is subjected to sexual harassment by someone who is not part of our workforce but who is encountered in connection with work. This includes our customers, suppliers, members of the public, clients, delegates at a conference, self-employed contractors etc.

Third-party sexual harassment of our workforce is unlawful and will not be tolerated. The law requires employers to take steps to prevent sexual harassment by third parties and we are committed to doing so.

If you have been subjected to third-party sexual harassment, you are encouraged to report this as soon as possible to your local HR representative or Group Head of HR / Group Legal Counsel

Should a customer sexually harass a member of our workforce, we will warn the client / customer of their behaviour. Any criminal acts will be reported to the police.

We will not tolerate sexual harassment by any member of our workforce against a third party. Instances of sexual harassment of this kind may lead to disciplinary action, including termination of employment.

### **Disciplinary action**

If the decision is that the allegation of sexual harassment or victimisation is well founded, the harasser/victimiser will be liable to disciplinary action in accordance with local labour codes / disciplinary procedure up to, and including, summary dismissal. An employee who receives a formal warning or who is dismissed for sexual harassment/victimisation may have the right to appeal the decision, dependant on local labour codes.

When deciding on the level of disciplinary sanction to be applied, we will take into consideration any aggravating factors affecting the case. One example of aggravating factors is an abuse of power over a more junior colleague.

If, due to the investigation, it is concluded that your complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

### **Training**

CI Academy provides training opportunities and is update regularly with new modules.