

Sexual Harassment Policy

The Policy Statement

Wounded Healers is committed to providing a safe environment for all its employees, free from discrimination on any ground and from harassment at work, including sexual harassment. Wounded Healers International will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously, and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and confidence. No one will be victimized for making such a complaint.

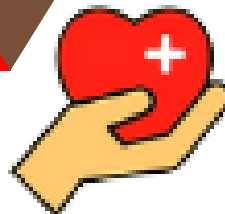
Definition of sexual harassment

Section 6 of the Employment Act defines sexual harassment as where an employer or a representative of the employer or a co-worker:

- Directly or indirectly requests an employee for sexual intercourse, sexual contact, or any other form of sexual activity that contains an implied or express
 - (i) promise of preferential treatment in employment
 - (ii) threat of detrimental treatment in employment
 - (iii) threat about the present or future employment status of the employee;
- Uses language, whether written or spoken, of a sexual nature.
- (Uses visual material of a sexual nature; or
- Shows physical behavior of a sexual nature that directly or indirectly subjects the employee to unwelcome or offensive behavior to that employee and that, by its nature, has a detrimental effect on that employee's employment, job performance, or job satisfaction.

Sexual harassment is unwelcome conduct of a sexual nature that makes a person feel offended, humiliated, and intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations that create a hostile, intimidating, or humiliating environment for the recipient.

Sexual harassment can involve one or more incidents, and actions constituting harassment may be physical, verbal, or non-verbal. Examples of conduct or behavior which form sexual harassment include, but are not limited to:



Physical conduct

- Unwelcome physical contact, including patting, pinching, stroking, kissing, hugging, caressing, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g., touching, pinching
- The use of job-related threats or rewards to solicit sexual favors

Verbal conduct

- Comments on a worker's or client's appearance, age, private life, etc.
- Sexual comments, stories, and jokes
- 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 sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and the sex of the harasser. Wounded Healers recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the behavior is directed.

Wounded Healers recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example, between a manager or supervisor and an employee.

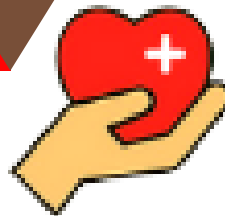
Anyone, including employees of Wounded Healers, clients, customers, casual workers, contractors, or visitors who sexually harass another, will be reprimanded following this internal policy.

All sexual harassment is prohibited, whether within Wounded Healers premises or outside, including at social events, business trips, training sessions, or conferences sponsored by Wounded Healers.

Complaints procedures

Anyone subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. However, wounded Healers recognize that sexual harassment may occur in unequal relationships (i.e., between a supervisor and their employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, they can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc.



When a designated person receives a complaint of sexual harassment, they will:

- Immediately record the dates, times, and facts of the incident(s)
- Ascertain the views of the victim as to what outcome they want
- Ensure that the victim understands the company's procedures for dealing with the complaint,
- Discuss and agree on the following steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if they are unsatisfied with the outcome.
- Keep a confidential record of all discussions
- Respect the choice of the victim
- Ensure the victim knows they can complain outside the company through the relevant country/legal framework.

Throughout the complaints procedure, a victim can be helped by a counselor within our organization. Wounded Healers will nominate several counselors and provide them with special training to enable them to assist victims of sexual harassment.

Wounded Healers recognizes that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward.

Wounded Healers understands the need to support victims in making complaints.

Informal complaints mechanism

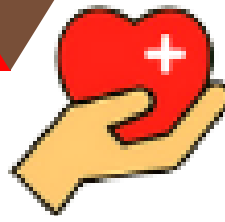
If the victim wishes to deal with the matter informally, the designated person will:

- Allow the alleged harasser to respond to the complaint
- Ensure that the suspected harasser understands the complaints mechanism
- Facilitate discussion between both parties to achieve an informal resolution that is acceptable to the complainant or refer the matter to a designated mediator within the company to resolve the issue
- And ensure that a confidential record is kept of what happens
- Follow-up after the outcome of the complaints mechanism to ensure that the behavior has stopped
- ensure that the above is done speedily and within three days of making the complaint. Formal complaints mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the legal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior human resources manager to instigate a formal investigation. The old human resources manager may deal with the issue themselves or refer the matter to an internal or external investigator.





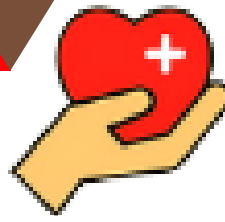
The person carrying out the investigation will:

- Interview the victim and the alleged harasser separately.
- Interview other relevant third parties separately and decide whether or not the incident(s) of sexual harassment took place.
- Produce a report detailing the investigations, findings, and any recommendations if the harassment took place; decide what the appropriate remedy for the victim is, in consultation with the victim (i.e., an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- Follow up to ensure that the recommendations are implemented, that the behavior has stopped, and that the victim is satisfied with the outcome
- If it cannot determine that the harassment took place, they may still make recommendations to ensure the proper functioning of the workplace
- keep a record of all actions taken and ensure that all documents concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and, in any event, within three days of the complaint.
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Outside complaints mechanisms

A person subject to sexual harassment can also complain outside the company. They can do so by calling the following numbers:

- 1195 -National GBV hotline
- 1190 – Counselling hotline
- 1517 – UNHCR toll-free number
- 0800-720600 -Telecounselling AMANI Counseling Center
- 0790781359 – CVT
- 0770451236 / 0777784009- HIAS
- 0704-873342 -NCKK Health coordinator
- 1196 – Childline
- 0711400506 – MSF hotline
- 0800720121 – LVCT toll-free number
- 999 / 112 – Kenya police emergency hotline



Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

Implementation of this policy

Wounded Healers International will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the company.

Every year, [name of company] will require all employees to attend a refresher training course on the content of this policy.

Every manager is responsible for ensuring that all his/her employees are aware of the policy.

Monitoring and evaluation

Wounded Healers International recognizes the importance of monitoring this sexual harassment policy. It will ensure that it anonymously collects statistics and data on how it is used and whether or not it is effective.

Supervisors, managers, and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the Wounded Healers will evaluate this policy's effectiveness and make any necessary changes.