

Anti-Harassment and Sexual Misconduct Policy

1. About this Policy

1.1. This policy sets out Principles of Intelligence's (PoI) commitment to create a working environment free from hostility in which individuals are valued for their contribution and can develop to their full potential.

1.2. PoI is committed to providing a working environment free from harassment, sexual misconduct, bullying, and ensuring all staff are treated and treat others with dignity and respect.

1.3. This policy covers harassment, sexual misconduct, or bullying at work and out of the workplace, such as on business trips, work-related events, or work-related social functions. In addition, it covers bullying, harassment, and sexual misconduct by staff and third parties such as suppliers, or visitors to our premises.

1.4. This Policy applies to all PoI employees, Board Members, Consultants, volunteers, Fellows, Affiliates, interns, and secondees, whether full-time or part-time, temporary or permanent.

1.5. In cases where the application of policy conflicts with national legislation, the legislation takes precedence.

1.6. The policy has been designed to inform everyone included in 1.3 and 1.4 about the type of behavior that is unacceptable and provides those who are victims of harassment, sexual misconduct, and bullying with a means of redress.

1.7. This policy does not form part of any employee's employment contract, and we may amend it at any time.

2. What Is Harassment and Sexual Misconduct?

2.1. Harassment is any unwanted physical, verbal, or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for them. A single incident can amount to harassment.

2.2. It also includes treating someone less favorably because they have previously been submitted to or refused to submit to such behavior.

2.3. Sexual misconduct is a form of harassment involving unwelcome sexual advances, requests for sexual favors, or other verbal, visual, or physical conduct of a sexual nature when

such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment. Sexual misconduct can occur between individuals of any gender or sexual orientation.

2.4. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or discrimination based on such things as age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, color, nationality, ethnic or national origin, religion, or belief, sex, or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

2.5. Examples of harassment and sexual misconduct include, but are not limited to:

2.5.1. **Verbal** – crude language, open hostility, offensive jokes, suggestive remarks, innuendoes, rude or vulgar comments, malicious gossip, offensive songs, unwanted sexual comments or propositions, repeated requests for dates, or threats.

2.5.2. **Non-verbal** – wolf-whistles, obscene gestures, sexually suggestive posters/calendars, pornographic material (both paper-based and generated on a computer, including offensive screensavers), offensive letters, offensive e-mails, text messages on mobile phones and messages on social media, leering, or inappropriate staring.

2.5.3. **Physical** – unnecessary and unwanted touching, patting, pinching, or brushing against another employee's body, intimidating behavior, assault, physical coercion, or blocking someone's path or movement.

2.5.4. **Coercion** – pressure or promises in return for sexual favors (e.g., to get a job or be promoted) and pressure to participate in political groups, etc.

2.5.5. **Offensive speech, emails, text messages, or social media content** directed at a person based on their protected characteristics.

2.5.6. **Mocking, mimicking, or belittling** a person's disability.

2.5.7. **Isolation or non-cooperation and exclusion** from social activities.

2.5.8. A person may be harassed even if they were not the intended "target."

2.6. Sexual misconduct and harassment are prohibited in all contexts related to Pol operations, including but not limited to the workplace, work-related travel, organizational events, online/virtual interactions, and all other professional settings where individuals represent Pol.

3. What Is Bullying?

3.1. Bullying is offensive, intimidating, malicious, or insulting behavior involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined, or threatened. Power does not always mean being in a position of authority but can include personal strength and the power to coerce through fear or intimidation.

3.2. Bullying can take the form of physical, verbal, and non-verbal conduct. Bullying may include, by way of example:

3.2.1. Shouting or swearing at people in public and private,

3.2.2. Persistent unjustified criticism, or criticism without offering constructive solution in case of criticism that may be justifies,

3.2.3. Spreading malicious rumors,

3.2.4. Physical or psychological threats.

3.2.5. Overbearing and intimidating levels of supervision,

3.2.6. Inappropriate derogatory remarks about someone's performance,

3.3. Legitimate, reasonable, and constructive criticism of a worker's performance or behavior, or reasonable instructions given to workers during their employment, will not amount to bullying on their own.

4. Complaints Process

4.1. **Informal Resolution:** If you are being harassed, bullied, or experiencing sexual misconduct, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly that their behavior is not welcome or makes you uncomfortable. If this is too difficult, embarrassing, or seems unsafe, you should speak to your line manager, who can provide confidential advice and assistance in resolving the issue formally or informally.

4.2. **Formal Complaint:** If informal steps are inappropriate or have not been successful, you should raise the matter formally through the following process:

4.2.1. **Submit a written complaint** to one or both of the Executive Directors (currently Lucas Teixeira and Dušan Nešić) detailing the incidents, dates, times, witnesses (if any), and the impact the behavior has had on you.

4.2.2. If Executive Directors are the subject of your complaint, please contact the President of the Board through their email (currently nora@Pol.ai).

4.2.3. **Acknowledgment:** You will receive acknowledgment of your complaint within 5 working days.

4.2.4. Investigation: An investigation will be initiated within 10 working days of receiving your complaint. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint.

4.3. Investigation Process:

4.3.1. Details of the investigation, the names of the people making the complaint, and the person accused will only be disclosed on a "need to know" basis.

4.3.2. All complaints will be investigated as promptly, impartially, and fairly as possible.

4.3.3. Regular updates on the progress of the investigation will be provided to all involved parties.

4.3.4. We will consider whether steps are necessary to manage any ongoing relationship between you and the person accused during the investigation, including temporary reassignment or paid leave if appropriate.

4.3.5. Interviews will be conducted with the complainant, the accused, and any relevant witnesses.

4.3.6. All those interviewed will have the right to be accompanied by a colleague or representative of their choice.

4.4. External Investigations: For complaints against leadership, Board members, or staff overseeing the complaints process, the Board will be notified immediately, and an external investigator may be appointed to ensure impartiality.

4.5. Outcome:

4.5.1. Once the investigation is complete, we will inform you of our decision in writing within 10 working days of the conclusion of the investigation.

4.5.2. If we consider you have been harassed, bullied, or subjected to sexual misconduct by an employee, the matter will be dealt with as a case of possible misconduct or gross misconduct under our disciplinary procedure.

4.5.3. If the harasser, bully, or perpetrator is a third party, we will consider appropriate action, such as potentially excluding them from future participation in events or programs.

4.5.4. Whether or not your complaint is upheld, we will consider how best to manage any ongoing working relationship between you and the person concerned.

4.5.5. Possible outcomes include but are not limited to: warning, probation, mandated training, change in responsibilities, suspension, or termination, as appropriate.

4.6. **Board Notification:** All complaints against leadership (e.g., Executive Directors), Board members, or staff overseeing the complaints process will be brought to the Board's attention immediately.

4.7. **Third-Party Complaints:** For complaints involving misconduct by non-employees (e.g., board members, donors, contractors, vendors), Pol will take appropriate action to investigate the complaint and, if substantiated, take measures to prevent future occurrences.

5. Protection and Support

5.1. **Non-Retaliation:** Staff who make complaints or participate in good faith in any investigation must not suffer any form of retaliation or victimization. Anyone found to have retaliated against or victimized someone in this way will be subject to disciplinary action.

5.2. **Confidentiality:** All complaints will be treated with as much confidentiality as possible, sharing information only on a need-to-know basis to conduct a fair investigation and fulfill our duty to provide a safe working environment.

5.3. **Support Resources:** Pol will provide access to support resources for affected individuals, which may include counseling services or referrals to appropriate external resources.

6. Record-keeping

6.1. Information related to a complaint by or about an employee may be recorded in the employee's personnel file, along with a record of the outcome and any notes or other documents compiled during the process.

6.2. All records relating to complaints will be kept confidential and in accordance with data protection regulations.

7. False Accusations

7.1. Making a false accusation of harassment, sexual misconduct, or bullying is a serious matter. If it is determined that a complaint was made maliciously or in bad faith, disciplinary action may be taken against the complainant.

7.2. A complaint made in good faith that is not substantiated does not constitute a false accusation.

8. Policy Awareness

8.1. This policy will be communicated to all employees, Board members, consultants, volunteers, fellows, affiliates, interns, and secondees on an annual basis and during onboarding processes.

9. Policy Review

9.1. This policy will be reviewed annually or whenever necessary to ensure its effectiveness and compliance with relevant legislation.

9.2. Any revisions to this policy will be communicated to all employees and relevant stakeholders.