

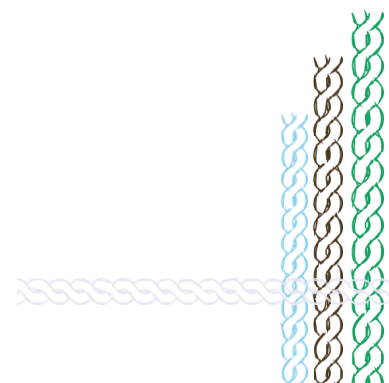
Anti- Discrimination & Harassment Policy

Policy No: 007/2017

ABSTRACT

At eBASE Africa we seek to improve livelihoods through the use of innovation and best practices for underserved populations. We aspire to do this in an environment free of all forms of discrimination and harassment.

eBASE Africa



Person Responsible	FR BERNADINE NSOM, BOARD LIAISON FOR ETHICS
Register of Systems	POLICIES AND PROCEDURES

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Introduction

Policy brief & purpose

Our anti-discrimination policy explains how we prevent discrimination and protect our employees, customers and stakeholders from offensive and harmful behaviors. This policy supports our overall commitment to create a safe and happy workplace for everyone.

Scope

This policy applies to all employees, research subjects, program beneficiaries, contractors, visitors, clients and stakeholders.

Policy elements

Discrimination is any negative action or attitude directed toward someone because of protected characteristics, like race and gender. Other protected characteristics are:

- Age
- Religion
- Ethnicity/ nationality
- Disability/ medical history
- Marriage / civil partnership
- Pregnancy / maternity/ paternity
- Gender identity/ sexual orientation

Discrimination and harassment

Our anti-discrimination and anti-harassment policies go hand-in-hand. We will not tolerate any kind of discrimination that creates a hostile and unpleasant environment for employees, interns or volunteers.

This is not an exhaustive list, but here are some instances that we consider discrimination:

- 🕒 Hiring managers disproportionately disqualifying male or female job candidates on purpose.
- 🕒 Managers bypassing team members with specific protected characteristics (e.g. race) for promotion without being able to formally prove (e.g. with documentation) the reasons other employees were selected instead.
- 🕒 Employees making sexist comments.
- 🕒 Employees sending emails disparaging someone's ethnic origin.



Employees who harass their colleagues will go through our disciplinary process and we may reprimand, demote or terminate them depending on the severity of their offence.

We recognize that sometimes discrimination is unintentional, as we may all have unconscious biases that could be difficult to identify and overcome. In case we conclude that an employee unconsciously discriminates, we will support them through training and counselling and implement processes that mitigate biases as we indicate in the next section. But, if this person shows unwillingness to change their behaviour, we may demote or terminate them.

We will not be lenient in cases of assault, sexual harassment or workplace violence, whether physical or psychological. We will terminate employees who behave like this immediately.

Actions to prevent discrimination

To ensure that our conduct and processes are fair and lawful, we:

- 🕒 Use inclusive language in job ads and include Equal Employment Opportunity statements.
- 🕒 Set formal job-related criteria to hire, promote and reward team members.
- 🕒 Offer compensation and benefits according to position, seniority, qualifications and performance, not protected characteristics.
- 🕒 Accommodate people with disabilities.
- 🕒 Require managers to keep detailed records of their decisions concerning their team members and job candidates.

We will also consider additional measures to prevent discrimination, like:

- 🕒 Using hiring processes that reduce bias like structured interviews and blind hiring programs.
- 🕒 Organizing trainings on diversity, communication and conflict management to improve collaboration among employees of different backgrounds.

What to do in cases of discrimination

If you are the victim of discriminatory behavior (or if you suspect that others are being discriminated against,) please talk to HR (or your manager) as soon as possible. HR is responsible for hearing your claim, investigating the issue and determining punishment.

Punishment for discriminatory behavior depends on the severity of the offence. For example, inadvertently offending someone might warrant a reprimand. Conversely, willfully bypassing employees for promotion because of a protected characteristic will result in termination.

If you decide to make a claim to a regulatory body (e.g. the Caisse Nationale de Prevoyance Sociale,) we are committed and bound by law [not to retaliate](#) against you.

How we address discrimination complaints

HR is proactive and responsive about determining whether discrimination occurs. For example, we:



- 🕒 Look into similar claims about the same person or process to determine if discrimination is systemic.
- 🕒 Track metrics and look into data that give us some insight on people's behaviours (e.g. percentage of job applicants of a certain race a hiring manager disqualifies.)
- 🕒 Evaluate testimonies on social media that visitors, job candidates or former employees have made.
- 🕒 Conduct discreet interviews and gather information.

We will investigate all claims discreetly. We will never disclose who made a complaint to anyone or give out information that may help others identify that person (e.g. which department or role they work in.)

We should all strive to prevent and address discrimination. Be aware of your implicit biases and speak up whenever you or your colleagues are discriminated against. If you have any ideas on how we can ensure fairness and equality in our workplace, we are happy to hear them.



Workplace Harassment Policy

Policy No: 007/01/2017

Introduction

This Workplace Harassment Policy may also be referred to as an **Anti-Harassment, Employee Harassment, Sexual Harassment or Racial Harassment Policy**. It complements the anti-discrimination policy and is to be used hand in hand.

Policy brief & purpose

Our anti-harassment policy expresses our commitment to maintain a workplace that's free of harassment, so our employees can feel safe and happy. We will not tolerate anyone intimidating, humiliating or sabotaging others in our workplace. We also prohibit wilful discrimination based on *age, sexual orientation, ethnicity, racial, religion or disability*.

Scope

This workplace harassment policy applies to all employees, contractors, public visitors, customers and anyone else whom employees come into contact with at work. For more details on how to recognize, report and deal with sexual harassment and harassment from outside our company, please refer to our sexual harassment policy and our third party harassment policy.

Policy elements

What is the definition of harassment in the workplace?

Harassment includes bullying, intimidation, direct insults, malicious gossip and victimization. We can't create an exhaustive list, but here are some instances that we consider harassment:

- 🕒 Sabotaging someone's work on purpose.
- 🕒 Engaging in frequent or unwanted advances of any nature.
- 🕒 Commenting derogatorily on a person's ethnic heritage or religious beliefs.
- 🕒 Starting or spreading rumours about a person's personal life.
- 🕒 Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g. bringing coffee) against their will.

Sexual harassment is illegal and we will seriously investigate relevant reports. If an employee is found guilty of sexual harassment, they will be terminated.

How to address harassment

If you're being harassed, whether by a colleague, customer or vendor, you can choose to talk to any of these people:



- 🕒 Offenders. If you suspect that an offender doesn't realize they are guilty of harassment, you could talk to them directly in an effort to resolve the issue. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues.) Avoid using this approach with customers or stakeholders.
- 🕒 Your manager. If customers, stakeholders or team members are involved in your claim, you may reach out to your manager. Your manager will assess your situation and may contact HR if appropriate.
- 🕒 HR. Feel free to reach out to HR in any case of harassment no matter how minor it may seem. For your safety, contact HR as soon as possible in cases of serious harassment (e.g. sexual advances) or if your manager is involved in your claim. Anything you disclose will remain confidential.

Disciplinary Consequences

Punishment for harassment depends on the severity of the offence and may include counselling, reprimands, suspensions or termination.



Sexual Harassment Policy

Policy No: 007/02/2017

Introduction

Policy brief & purpose

Our sexual harassment policy aims to protect men and women in our company from unwanted sexual advances and give them guidelines to report incidents. We will also explain how we handle claims, punish sexual harassment and help victims recover.

We won't tolerate sexual harassment in our workplace in any shape or form. Our culture is based on mutual respect and collaboration. Sexual harassment is a serious violation of those principles.

Scope

This policy applies to every person in our company regardless of gender, sexual orientation, level, function, seniority, status or other protected characteristics. We are all obliged to comply with this policy.

Also, we won't tolerate sexual harassment from inside or outside of the company. Employees, investors, contractors, customers and everyone interacting with our company are covered by the present policy. For further details about how we deal with harassment from the outside of our company, please refer to our [third party harassment policy](#).

Policy elements

What is sexual harassment?

Sexual harassment has many forms of variable seriousness. A person sexually harasses someone when they:

- 🕒 Insinuate, propose or demand sexual favours of any kind.
- 🕒 Invade another person's personal space (e.g. inappropriate touching.)
- 🕒 Stalk, intimidate, coerce or threaten another person to get them to engage in sexual acts.
- 🕒 Send or display sexually explicit objects or messages.
- 🕒 Comment on someone's looks, dress, sexuality or gender in a derogatory or objectifying manner or a manner that makes them uncomfortable.
- 🕒 Make obscene comments, jokes or gestures that humiliate or offend someone.
- 🕒 Pursue or flirt with another person persistently without the other person's willing participation. Also, flirting with someone at an inappropriate time (e.g. in a team meeting) is considered sexual harassment, even when these advances would have been welcome in a different setting.



This is because such actions can harm a person's professional reputation and expose them to further harassment.

The most extreme form of sexual harassment is sexual assault. This is a serious crime and our company will support employees who want to press charges against offenders.

Our company's rules on sexual harassment

- 🕒 No one has the right to sexually harass our employees. Any person in our company who is found guilty of serious harassment will be terminated, whether they are VPs or assistants. Also, if representatives of our contractors or vendors sexually harass our employees, we will demand that the company they work for takes disciplinary action and/or refuse to work with this person in the future.
- 🕒 Sexual harassment is never too minor to be dealt with. Any kind of harassment can wear down employees and create a hostile workplace. We will hear every claim and punish offenders appropriately.
- 🕒 Sexual harassment is about how we make others feel. Many do not consider behaviors like flirting or sexual comments to be sexual harassment, thinking they are too innocent to be labelled that way. But, if something you do makes your colleagues uncomfortable, or makes them feel unsafe, you must stop.
- 🕒 We assume every sexual harassment claim is legitimate unless proven otherwise. We listen to victims of sexual harassment and always conduct our investigations properly. Occasional false reports do not undermine this principle.
- 🕒 We will not allow further victimization of harassed employees. We will fully support employees who were sexually harassed and will not take any adverse action against them. For example, we will not move them to positions with worse pay or benefits or allow others to retaliate against them.
- 🕒 Those who support or overlook sexual harassment are as much at fault as offenders. Managers and HR especially are obliged to prevent sexual harassment and act when they have suspicions or receive reports. Letting this behaviour go on or encouraging it will bring about disciplinary action. Anyone who witnesses an incident of sexual harassment or has other kinds of proof should report to HR.

How to report sexual harassment

If you are being sexually harassed (or suspect another person is being harassed), please report it to [*HR manager, HR generalist or your manager.*] In serious cases like sexual assault, please call the police and inform HR that you plan to press charges. We acknowledge it's often hard to come forward about these issues, but we need your help to build a fair and safe workplace for you and your colleagues.

If you want to report sexual harassment within our company, there are two options:

- 🕒 **Ask for an urgent meeting with your [HR manager or HR generalist or supervisor.]** Once in the meeting, explain the situation in as much detail as possible. If you have any hard evidence (e.g. emails), forward it or bring it with you to the meeting.



- 🕒 **Send your complaint via email.** If you address it to your supervisor, please cc HR to the email and attach any evidence or information that can be used in the investigation. HR and your supervisor will discuss the issue and contact you as soon as possible.

If you report assault to the police, our company will provide any possible support until the matter is resolved. In any case, we will ensure you are not victimized and that you have access to relevant evidence admissible in court, like security video footage or emails (without revealing confidential information about other employees.)

Inadvertent harassment

Sometimes, people who harass others do not realize that their behaviour is wrong. We understand this is possible, but that doesn't make the perpetrator any less responsible for their actions.

If you suspect that someone doesn't realize their behaviour is sexual harassment under the definition of this policy, let them know and ask them to stop. Do so preferably via email so you can have records. Please do not use this approach when:

- 🕒 Your manager, an upper manager, investor or customer is the perpetrator.
- 🕒 Sexual harassment goes beyond the boundaries of off-hand comments, flirting or jokes.

In the above cases, report to HR as soon as possible.

Disciplinary action and repeat offenders

Employees who are found guilty of sexual assault will be terminated after the first complaint and investigation.

Employees who are found guilty of sexual harassment (but not assault) the first time may:

- 🕒 Be reprimanded and fined.
- 🕒 Get a "below expectations" performance review.
- 🕒 See expected promotions and/or salary increases freeze for 6 months

We may also transfer harassers or take other appropriate action to protect their victims. We will terminate repeat offenders after the second claim against them if our investigation concludes they are indeed guilty.

We apply these disciplinary actions uniformly. Employees of any sexual orientation or other protected characteristics will be penalized the same way for the same offenses.

HR responsibilities

First and foremost, HR and managers should try to prevent sexual harassment by building a culture of respect and trust. But, when sexual harassment occurs and an employee makes a complaint, both HR and managers must act immediately.

Managers should talk to HR and explain our company's procedures to their team member who made the complaint.



When HR receives a complaint that an employee harasses another employee, they will:

- 🕒 Ask for as many details and information as possible from the person or people making the complaint.
- 🕒 Keep copies of the report with dates, times and details of incidents and any possible evidence in a confidential file (separate from the personnel file.) HR should update this file with all future actions and conversations regarding this complaint.
- 🕒 Launch an investigation. If the matter is complex, the HR person can defer to a more senior manager.
- 🕒 Check if there have been similar reports on the same person. If there are, HR should contact the perpetrator's manager to let them know that their team member may get fired when the investigation is over.
- 🕒 Inform the harassed employees of our company's procedures and their options to take legal action if appropriate.
- 🕒 Take into account the wishes of the harassed employee. Some might want the matter to be resolved informally and discreetly, while others might expect more radical actions (e.g. transferring the perpetrator.) HR should consider the circumstances and decide on appropriate action.
- 🕒 Contact the harasser and set up a meeting to explain the complaint and explicitly ask for this behaviour to stop, or,
- 🕒 Arrange for mediation sessions with the two employees (harasser and perpetrator) to resolve the issue, if the harassed employee agrees or,
- 🕒 Launch a disciplinary process depending on the severity of the harassment. In cases of sexual assault or coercing someone to sexual favours under threats, we will terminate the harasser immediately. We will terminate employees who are found guilty in a court of law of sexually assaulting another employee, even if HR has not conducted its own investigation.

HR or managers must not, under any circumstances, blame the victim, conceal a report or discourage employees from reporting sexual harassment. If HR or a manager behaves that way, please send an email to their own manager or a senior HR leader explaining the situation.

We welcome any feedback or complaints about our procedures and how our employees handled each case.

Helping harassment victims

Apart from investigating claims and punishing perpetrators, we want to support the victims of sexual harassment. If you experience trauma, stress or other symptoms because of harassment, consider:

- 🕒 *Taking a few days of sick leave to restore your mental health.*
- 🕒 *Asking your insurance provider whether they cover mental health services.*
- 🕒 *Talking to our EAP (Employee Assistance Program) Officer to evaluate options.*
- 🕒 *Speaking to our designated counsellors.*



Your job and benefits will not be jeopardized or altered if you choose any of those options or other means to recovery.

Speak up, we listen

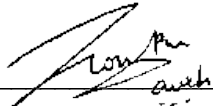
Sexual harassment can exhaust those who endure it. Speaking up about this issue is often tough for fear of not being heard, upsetting managers and challenging corporate culture.

Please don't let these fears deter you. Our company will do everything possible to stop sexual harassment and any other kind of harassment from happening, while supporting harassed employees. We need to know what's going on so we can act on it. And by raising your voice on this issue, you help our company create a happy workplace and thrive.



This policy was adopted by eBASE Africa on 3rd April 2017

Signed on behalf of the Board of Trustees by:

Signature 
DR PATRICK MBAH OKWEN

The policy has been reviewed by the Board of Trustees on:

Date 3rd April 2017

