



## **HR Policies Manual**

# **Sexual Harassment Policy**

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### **3. SEXUAL HARASSMENT POLICY**

#### **3.1 STATEMENT OF INTENT**

Octagon Values defines the standards with which Octagon conducts its operations – with integrity and responsiveness and with respect for human rights and interest of employees.

Octagon recognizes that sexual harassment can occur in the workplace and is committed to preventing and ending it. Octagon will take a zero tolerance approach to sexual harassment and all forms of harassment and will work towards ensuring all our employees are treated with respect, dignity and in accordance to human rights standards as set out in the Respect, Dignity and Fair Treatment Policy.

#### **3.2 SCOPE**

The Sexual Harassment Policy applies to all employees of Octagon and of our suppliers, vendors, distributors, business partners and third parties who represent Octagon or act on our behalf. This Policy applies to all employees, suppliers, vendors, distributors, business partners and third parties while conducting company business, in and out of Octagon premises.

Octagon defines sexual harassments as -

***'Unwanted or unwelcome sexual conduct or advances which create discomfort, embarrassment or feelings of insecurity. Sexual harassment is a display of power which is intended to intimidate, coerce or degrade another employee.'***

Sexual harassment may also be directed at an individual or group of individuals and may occur between all combinations of gender.

#### **3.3 FORMS OF SEXUAL HARASSMENT**

Sexual harassment can take many forms including –

##### **3.3.1 PHYSICAL**

- Assaults
- Invasion of privacy including unwelcome visits to an employee's house
- Touching, massaging, kisses, groping, grabbing, pinching, squeezing or brushing against someone.
- Leering or ogling
- Sexually suggesting signals and winking
- Soliciting sexual favors through use of threats or rewards

##### **3.3.2 VERBAL CONDUCT**

- Offensive and derogatory comments about a person's age, appearance, private life and sexual orientation
- Stories and jokes of a sexual nature
- Whistling
- Persistent and unwanted social invitations
- Insults of a sexual nature

- Sexual advances
- Gender stereotypes of a sexual nature

### **3.3.3 NON-VERBAL CONDUCT**

- Display of visual materials of a sexual nature including videos, pictures, photographs, posters, graffiti, calendars and emblems;
- Display or sharing written materials of a sexual nature including use of text messaging, office intranet, emails, chats, Octagon chatter or any social media forums
- Sexual gestures and indecent exposure

Sexual harassment can occur in the following ways –

- Sexual harassment by a co-worker
- Supervisor harassment of direct reports and subordinate employees
- men can be sexually harassed by women and vice versa;
- subordinate employees or direct reports sexually harass supervisors
- same sex harassment – men can harass men; women can harass women:

### **3.4 POLICY CONTRAVENTIONS**

Violation of this Policy will be treated as a disciplinary offence under Octagon Values.

Attempts to handle sexual harassment complaints informally through internal mechanisms will be addressed as a breach to this Policy.

### **3.5 GRIEVANCE PROCEDURE**

All complaints of sexual harassment should be raised through the Octagon grievance procedure.

Grievances will be investigated thoroughly and impartially and handled in the strictest of confidence. With the consent of the aggrieved person and witnesses, the identities of all persons involved will be kept confidential during investigations and only appropriate and necessary persons will be involved in any disciplinary hearings.

Octagon will not tolerate retaliation or victimization against persons who lodge complaints and/or participate in any proceedings under this Policy.

Octagon will ensure that thorough and impartial investigations are carried out and where a complaint is found to be malicious, it will be treated as a disciplinary offence. Counseling services will be offered to complainants who may require this.

### **3.6 COMPELLING OBLIGATION**

Octagon has a compelling obligation to address all allegations of sexual harassment when information is obtained that there may be a violation of this Policy.

Octagon is not precluded from taking any action it deems appropriate, including informing the alleged harasser of the complaint and pursuing an investigation even in cases when the complainant is reluctant to report or proceed.

Octagon is committed to ensuring that complainants or victims of sexual harassment are involved in the disciplinary proceedings voluntarily.

### **3.7 POLICY DISSEMINATION AND REVIEW**

Octagon is committed to ensuring that all employees, suppliers, third parties, business partners, vendors and distributors are trained on the contents of this Policy.

Dissemination of this Policy will be done through regular awareness creation engagements, posters, leaflets, campaigns, email updates and any other relevant mode of communication.

Octagon will review the Sexual Harassment Policy on a bi-annual basis.