



HARASSMENT, BULLYING AND DISCRIMINATION POLICY

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| Functional Area | People & Culture Department |
| Business Owner | Employment Relations & Inclusion Team |
| Approved by | PII's Leadership Team |
| Approval date | 7 March 2022 |
| Effective date | 1 June 2022 |
| Review date | 1 June 2025 |
| Applicability and Exceptions | Plan International Inc. and its subsidiaries including Country Offices, Regional Offices, Liaison Offices and Global Hub |
| Related Policies | Whistleblowing Policy (PII Policy) Preventing Sexual Harassment, Exploitation and Abuse Policy PII Code of Conduct Global Policy on Values Conduct and Whistleblowing Grievance Policy (PII Policy) Disciplinary Policy (PII Policy) PII Referencing Policy |

1. Introduction

- 1.1. Plan International Inc. values a safe and inclusive work environment in which mutual dignity and respect are critical to effective and happy working relationships. Our work is based on deeply held values and a clear purpose, and we operate based on, without limitation to, feminist leadership, gender equality and anti-racism principles. We are committed to a working environment free from harassment, bullying and any form of discrimination. This is reinforced in Plan's Values and Behaviours and the standards of the PII Code of Conduct, both of which explain the behaviours that are encouraged and those which are unacceptable within PII.
- 1.2. PII has a policy of zero tolerance of harassment (including sexual harassment), bullying or discrimination. Failure to comply with the provisions of this policy may be subject to a disciplinary process.

2. Purpose

- 2.1. The purpose of this policy is to ensure we are all able to identify harassment (including sexual harassment), bullying or discrimination and understand the role of each one of us in preventing these behaviours, and the consequences of such actions and conduct to create and promote a safe and supportive environment and culture.

3. Scope and Application

- 3.1. PII does not dictate the belief and value systems by which Staff and Associates conduct their personal lives. However, actions taken by them outside of working hours (whether inside or outside of the workplace environment) that are seen to contradict or breach this policy (or its intent) may be considered a violation of this policy.
- 3.2. This policy should be read in conjunction with local legislation. However, behaviour which violates this policy will never be considered acceptable on the basis that it is permissible under local law. Similarly, nothing in this policy will prevent PII from taking disciplinary action in relation to behaviour which contravenes local law.
- 3.3. The policy shall also be read in conjunction with the Whistleblowing Policy (PII Policy), Preventing Sexual Harassment, Exploitation and Abuse (PHSHEA) Policy, PII Code of Conduct, Global Policy on Values Conduct and Whistleblowing, Grievance Policy (PII Policy) Disciplinary Policy (PII Policy) and PII Referencing Policy.

4. Guiding Principles

- 4.1. We all have a part to play in creating and sustaining a safe and healthy working environment that enables each one of us to be ourselves and achieve our aspiration, both individually and as an organisation, in relation to our mission.
- 4.2. As an organisation we are:
 - a) **Inclusive**, recognising that everyone is unique and encouraging everyone to feel confident in bringing their true selves to the organisation, to achieve their full potential.
 - b) **Free** from unfair treatment and any form of unacceptable behaviour.

- c) **Diverse**, welcoming all and treating all with dignity and respect.
- d) **Responsible and accountable** for our actions and the impact we have on others.
- e) **Empowering and enabling** to encourage all to raise, discuss and challenge unacceptable behaviours.
- f) **Committed** to addressing and resolving unacceptable behaviours
- g) **Open** and honest
- h) **Supportive**, sensitive and empathetic

5. Identifying Harassment, Bullying and Discrimination - Definitions and Examples

5.1. Harassment is any form of unwanted comments or actions that violates the dignity of the person it is targeted at or creates an intimidating, hostile, degrading, humiliating or offensive environment. Harassment may involve conduct of a sexual nature (see further below re Sexual Harassment), or it may be related to any other Individual Characteristics of the person or persons affected. Harassment is unacceptable even if it does not fall within any of these categories.

5.2. Harassment could involve physical or verbal behaviour that is belittling, condescending, degrading, threatening, malicious, violating or affecting of a person's dignity, or otherwise offensive. Harassment can also be treating someone unfairly because they have submitted to, or refused to submit to, such behaviour. Harassment may happen on one occasion, or on several occasions; there does not need to be a pattern of persistent unwanted behaviour for it to amount to harassment. Isolated incidents might be considered harassment if the action is demeaning or humiliating to the recipient.

5.2.1. Harassment may include, without limitation:

- a) Unwanted physical conduct, including touching, pinching, pushing and grabbing or gestures;
- b) Offensive, derogatory language or intimidating actions or behaviours;
- c) Insulting or threatening gestures, language (overt or implied) or continual and unwarranted shouting;
- d) Unjustified and/or unnecessary comments about a person's work or capacity for work;
- e) Openly displayed pictures, posters, graffiti, written materials, emails or digital media which might be offensive to some;
- f) Displaying of racially offensive material;
- g) Verbal threats, insults or racist jokes;
- h) A statement, action or incident regarded as an instance of indirect, subtle or unintentional discrimination, prejudice, stereotyping or otherwise unfair against members of a marginalised group such as a racial or ethnic minority;
- i) Phone calls or messages on voicemails or electronic mail or computer networks which are demeaning, threatening, abusive, humiliating, offensive or otherwise unwanted;

- j) The exclusion of a person, or group, from normal conversations, work assignments, work related updates, information, resources, meetings, work related social activities and networks;
- k) Mocking, mimicking or belittling a person's disability; or
- l) Racist, homophobic or ageist jokes or derogatory or stereotypical remarks about a particular ethnic or religious group, gender or age group.

This list is not exhaustive, nor will the above conduct always amount to harassment. In any case, the question will be whether the **purpose** or **effect** of the conduct was to violate the target's dignity or create an intimidating, hostile, degrading, humiliating or offensive environment and (where it was not the perpetrator's purpose) whether it was reasonable for the conduct to have that effect.

5.3. Sexual Harassment is any form of unwelcome sexual advance, unwelcome request for sexual favours or any other unwanted conduct of a sexual nature, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person to whom the conduct is directed would be offended, humiliated or intimidated, or that the conduct would otherwise have the impact of violating the individual's dignity.

5.4. Sexual harassment can take various forms. It can be obvious or indirect, physical, verbal or visual, via electronic means including text or video messages, repeated or one off and perpetuated by any person of any gender towards any person of any gender. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

5.4.1. Sexual harassment may include, without limitation:

- a) Gestures;
- b) Unwanted physical conduct, including touching, pinching, pushing and grabbing;
- c) Persistent following or stalking;
- d) Insinuations about a person's private life;
- e) Inappropriate or offensive comments about physical appearance;
- f) The display of offensive material, sexist comments or comments of a sexual nature;
- g) Outing someone's sexual orientation or gender identity;
- h) Asking sexual questions, such as questions about someone's sexual history or their sexual orientation;
- i) Implicit or explicit demands for sexual activity or subtle pressure for sexual favours;
- j) Making repeated comments about someone's physical appearance;
- k) Gender, gender identity or sexual orientation related insults; or
- l) Pranks which are lewd in nature, making lewd jokes or sharing sexual anecdotes.

This list is not exhaustive. Sexual harassment may include other behaviours. This section on sexual harassment should be read in conjunction with the PII PSHEA Policy which deals with the importance of preventing sexual harassment, along with the prevention of sexual exploitation and abuse, including in relation to Staff and Associates.

5.5. Sexual harassment may not arise in the context of a mutual sexual attraction and/or flirtation based upon choice and consent provided this is freely reciprocal and there is no power imbalance or power privilege affecting and/or influencing the interaction. In some cases, a

mutual sexual relationship may present a conflict of interest, e.g. if one party may be involved in decisions about the other party's career progression. Staff are responsible for disclosing the fact that they are in a relationship which may be perceived as giving rise to a conflict of interest or breach of confidentiality to their Line Manager and/or HR manager

5.6. Bullying is offensive, intimidating, malicious, insulting or otherwise unfair or unacceptable behaviour which may involve the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined, threatened or otherwise adversely affected. Power does not always mean being in a position of authority but could include both personal strength and power to coerce through fear of intimidating. Bullying may take the form of physical, verbal or visual conduct.

5.6.1. Bullying may include, without limitation:

- a) Intimidation;
- b) Victimisation;
- c) Verbal abuse or threats, including yelling, screaming or offensive language;
- d) Excluding or isolating people from work activities;
- e) Assigning impossible tasks or deadlines, meaningless tasks unrelated to the individual's job, or giving someone the majority of unpleasant tasks;
- f) Overbearing and intimidating levels of supervision;
- g) Undermining responsibility;
- h) Withholding information essential to complete a task properly;
- i) Making threats or comments about job security without foundation;
- j) Changing work arrangements (i.e. leave) to inconvenience a particular individual;
- k) Spreading malicious rumours;
- l) Cyber bullying; or
- m) Physical, psychological, intellectual or emotional threats or abuse.

5.6.2. This list is not exhaustive and Bullying may include other behaviours.

5.7. Discrimination is treating someone unfairly, adversely or less favourably because of an Individual Characteristic(s) and, where applicable, this is not justifiable. These characteristics includes a person's race, ethnicity, gender, disability, sexual orientation etc. This also includes retaliating against someone who has complained, or supported another's complaint, of unacceptable behaviour.

5.7.1. Discrimination includes, without limitation:

- a) Failing to hire a job applicant or terminating employment or engagement for a reason that is not fair or, as applicable, justified;
- b) Unfair treatment of someone for a position in the organisation;
- c) Following policies or practices that unfairly deprive people of employment, engagement or advancement opportunities or adversely affect them;
- d) Retaliating against an individual who has filed a complaint, or supported someone who has filed a complaint;
- e) Treating someone unfairly in situations with respect to their compensation or other terms of employment or engagement; or
- f) Failing to reasonably accommodate reasonable adjustments for someone, as applicable.

5.7.2. This list is not exhaustive and what is meant by Discrimination may include other behaviours.

5.7.3. We recognise that incidents of Discrimination relating to, for example, race or sex may be driven by gender inequality, gender bias and/or unequal power relations, which may manifest as, without limitation, micro-aggressions, and abuse of power or other form of privilege or oppression, and we are committed to responding robustly to all allegations of Discrimination.

5.8. Anti-racism – As an organisation that exists to further children’s rights and equality for girls, and that sees racial injustice as a critical and crucial component of justice for girls, we stand against all forms of racially-based injustice, abuse, violence, discrimination, prejudice, privilege or abuse of power including racial micro-aggressions, and all other forms of unacceptable behaviour and conduct in any way related to race. Any form of harassment, bullying or discrimination based on race, colour, ethnic origin, language or cultural background will not be tolerated.

6. What Harassment, Bullying and Discrimination is not:

6.1. Harassment, bullying or discrimination, must not be confused with legitimate comments and advice (including negative or constructive feedback or comment) from colleagues, managers and supervisors on work performance or work-related behaviours of an individual or group. Legitimate, reasonable and constructive criticism of performance or behaviours, reasonable instructions given to you in the course of your employment or engagement or a direction to comply with any Plan policies, procedures or guidelines, including our Values and Behaviours, will not amount to harassment, bullying or discrimination.

6.2. The process of providing feedback or counselling Staff or Associates regarding their work performance will not always be free of stress or tension. Managers should manage these processes with sensitivity and respect; however, they should not avoid their responsibility to provide full, candid and honest feedback.

7. Raising a Concern Under the Harassment, Bullying and Discrimination Policy

7.1. Reporting concerns in respect of harassment, bullying or discrimination is critical to PII’s ability to find resolutions to facilitate effective and respectful working relationships. All allegations relating to harassment, bullying and discrimination are taken very seriously.

7.2. Staff and Associates are encouraged to speak to someone they trust if they believe they have been subjected to harassment, bullying or discrimination. This may be done verbally to a line manager or a member of your local HR team but could be any other colleague, or a friend or family member. The process of talking through what has happened with someone else - can help to determine what action should be taken.

7.3. Staff and Associates may raise any issue, concern or complaint of harassment, bullying or discrimination, or that they otherwise consider to be contrary to this policy (or its intent), under the PII’s Grievance Policy if they are the alleged victim or have been personally affected by the alleged wrongdoing (i.e. **experienced** it).

7.4. Under PII’s Grievance Policy, either an informal or formal process may be recommended to address issues raised under this Harassment Bullying and Discrimination Policy, depending on the nature of the concern and taking account of the circumstances and wishes of the individuals involved.

- 7.4.1.** Informal interventions that may be proposed may include an informal meeting with the parties concerned or a mediation process by an accredited mediator to promptly address the issues raised. A mediation process is a voluntary process, and both parties will be required to agree to a mediation process before it proceeds.
- 7.4.2.** The formal grievance procedure is set out in the PII Grievance Policy and may include either/both internal and external fact-finding/investigation, and formal meetings.
- 7.5.** We encourage all Staff and Associates to stand up and challenge others when they **witness** behaviour that might amount to harassment, bullying or discrimination, and encourage a climate of feedback and accountability.
- 7.6.** Staff and Associates are encouraged to call out this unacceptable behaviour, either by providing direct feedback to the person(s) causing the problem, or by raising either verbally or in writing with the person's line manager, or HR manager, or via the electronic Incident Reporting System. Where Staff or Associates have witnessed behaviour that they believe amounts to harassment, bullying or discrimination, and they wish to report it anonymously, they may do so via Safecall. Where relevant, the protections of PII's Whistleblowing Policy will apply. Staff and Associates are encouraged to raise matters under this Policy in a timely manner without unreasonable delay.
- 7.7.** PII has a policy of zero tolerance to harassment (including sexual harassment), bullying or discrimination. Where an allegation raised under this Policy is substantiated, preparators will be subject to a disciplinary process and possible disciplinary sanctions. While this Policy applies to both Staff and Associates, PII has more direct control over its Staff and is therefore able to apply disciplinary sanctions in relation to staff behaviour which it may not be able to do in relation to Associates. Where an allegation of harassment, bullying or discrimination is substantiated and amounts to gross misconduct, the disciplinary sanction for Staff is termination of employment.
- 7.8.** In accordance with the PII's Referencing Policy, a reference for individuals who are dismissed or otherwise disciplined for actions related to harassment, bullying or discrimination where this amounts to gross misconduct, will include a disclosure of such misconduct.

8. Roles and Responsibilities

- 8.1.** The implementation of this Policy requires the commitment of us all and we all have a responsibility to understand and implement standards of behaviour that enable us to live Plan's Values and Behaviours.
- 8.2.** All Staff and Associates will:
- a) Treat others with dignity and respect;
 - b) Behave at all times in accordance with Plan's Values and Behaviours;
 - c) Create and contribute to building an environment of mutual dignity and respect that is free from harassment, bullying and discrimination and promotes a safe and healthy environment;
 - d) Hold themselves accountable for their actions, understanding how their actions may affect others and making changes as necessary;
 - e) Be aware of harassment, bullying and discrimination and the forms it can take and of the damage it can cause to individuals and to PII as an organisation;

- f) Reflect on, discuss, share and seek to resolve any concerns or issues relating to unacceptable behaviours as part of day-to-day practice;
- g) Act quickly and immediately to report any suspected acts of unacceptable behaviours or wrongdoings including any breaches of this policy or Plan's Values and Behaviours; and
- h) Speak out against, challenge and address harassment, bullying or discrimination you experience or witness.

The CEO, Executive Management (including Regional Directors, Country Directors and other Directors) will:

- a) Treat others with dignity and respect;
- b) Behave at all times in accordance with Plan's Values and Behaviours;
- c) Promote a safe and healthy working environment by applying all relevant policies and mechanisms to ensure Staff and Associates understand and minimise the risks of any forms of harassment, bullying and discrimination;
- d) Ensure that all Staff and Associate are aware of the high standards of behaviour and conduct required of them to ensure acceptable behaviour and mutual dignity and respect, which is free from harassment, bullying and discrimination;
- e) Escalate incidents of substantiated breaches of this Policy to relevant external authorities as appropriate/deemed necessary;
- f) Ensure all Staff and Associates are clear on the steps to take to raise issues harassment, bullying and discrimination;
- g) Take action to address reports of harassment, bullying or discrimination to ensure the safety and wellbeing of those affected; and
- h) Encourage all Staff and Associates to speak out against harassment, bullying or discrimination.

9. Terms and Definitions

9.1.1. Associates: refers to any individual whose relationship with PII is governed by a contract of engagement (such as, without limitation, contractors, consultants and those who are self-employed), any volunteers (whether paid or unpaid), any community volunteers, board members, interns, any individuals who are otherwise affiliated with PII such that they could objectively be seen as a representative of PII and any other paid or unpaid individuals who work with PII and who agree to abide by this Policy.

9.1.2. Individual Characteristics: may include, without limitation, age, sex, gender identity, sexual orientation, nationality, ethnic origin, colour, race, culture, language, religion or other beliefs, relationship status, disability, physical or mental health, family status, social-economic or cultural background, class, job position, geographical location and/or any other aspect of an individual's background or identity.

9.1.3. PII: refers to Plan International, Inc., including its headquarters in the United Kingdom (operating through its subsidiary, Plan Limited) and all of the country offices, regional offices, liaison offices and any other offices, some of which operate as branches and some as subsidiaries. Also referred to in this document as "we", "us" and "our".

9.1.4. Staff: refers to any individuals whose relationship with a PII is governed by a contract of employment.