

## **WV Harassment Prevention Policy**

### **Purpose:**

To outline and define World Vision International's policy regarding harassment prevention in the work place.

### **Scope:**

This policy applies to all WVI employees (covering all employment categories including without limitation national, expatriate, contract employees and HCLs), interns and volunteers working outside the United States and non-employees such as vendors, independent contractors (consultants), visitors and others doing business with WVI including donors and beneficiaries. This policy governs conduct in the workplace (any place where WVI employees perform work for WVI) as well as off-premises situations with a relationship to the workplace or that affect the workplace.

### **Policy:**

World Vision International (WVI) endeavors to promote a corporate culture of dignity, respect and courtesy, in line with WVI's Core Value -- "We value people." In keeping with this concept, World Vision International is committed to providing a work environment that is free of discrimination and prohibits unlawful harassment including sexual harassment and harassment based on race, color, national origin, age, gender, disability or any other characteristic protected by discrimination laws. WVI expects all its personnel and others doing business with WVI to conduct themselves in a manner consistent with this goal.

Accordingly, World Vision International will:

- Take appropriate measures to prevent harassment;
- Rigorously investigate all complaints of harassment;
- Take appropriate corrective action in cases of substantiated harassing behaviour.
- Take appropriate corrective action in cases of false claims
- Provide access to a safe place where personal support and counseling can be obtained.

All allegations of harassment will be investigated promptly, impartially and confidentially by an individual or team appointed by People & Culture (P&C). Any member of WVI personnel found to have acted in violation of this policy shall be subject to corrective action, up to and including termination, as deemed appropriate by WVI.

WVI will not tolerate retaliation against anyone who complains of harassment in good faith or who participates in an investigation.

### **Definitions:**

#### **A. What is Sexual Harassment ?**

Sexual harassment includes, but is not limited to, making unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature where either:

- Submission to such conduct is made an explicit or implicit term or condition of employment
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individuals
- Or such a conduct has the purpose of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

**Examples** of sexual harassment include but are not limited to:

- Unwanted sexual advances, including verbal sexual advances and propositions including unwanted repeated requests for dates
- Offering employment benefits in exchange for sexual favors
- Making or threatening reprisals after a negative response to sexual advances
- Leering, making sexual gestures
- Displaying pornographic or sexually suggestive objects or pictures, cartoons, or posters

- Use of computers, including the Internet and email system, text messages, to transmit, communicate or receive derogatory messages or material. Other communications may include telephone calls, letters, and faxes. Messages sent on company computer systems are recoverable and can be used in an investigation.
- Using inappropriate terms of endearment
- Graphic verbal commentaries about an individual's body
- Sexually degrading words used to describe an individual
- Suggestive or obscene letters, notes, or invitations
- Physical conduct such as an attack, uninvited or unwanted touching, deliberately blocking normal movement or persistent, unwanted invasion of personal space.
- Retaliation for having reported unlawful sexual harassment that could occur during or after an investigation

**Note:** Because WVI is a diverse organisation, it is important that staff exercise cross-cultural sensitivity. Conservative professional decorum should be exercised to prevent misunderstandings (for example refrain from greetings that involve kissing and hugging).

### **B. What are Other Types of Unlawful Harassment ?**

Harassment is conduct that denigrates or shows hostility or aversion towards an individual, or creates a hostile work environment because of his/her:

- Race, ethnic origin, ancestry, nationality or color
- Age
- Gender
- Religious convictions
- Denominational allegiance
- Disability
- Military service
- Other legally protected basis

**Examples** of Harassment may take many forms including but not limited to:

- Verbal conduct such as epithets, derogatory comments, slurs, improper joking or teasing, comments or conversation
- Visual conduct such as derogatory posters, cartoons, drawings or gestures
- Physical conduct such as attack, use of physical force, blocking normal movement or unwanted presence in work area
- Use of computers, including the Internet and email system, text messages, to transmit, communicate or receive derogatory messages or material. Other communications may include telephone calls, letters, and faxes. Messages sent on company computer systems are recoverable and can be used in an investigation.
- Non-sexual but gender-based acts of aggression, intimidation, hostility or treatment with an unequal intent
- Retaliation for having reported unlawful harassment that could occur during or after an investigation

### **Legal Aspects:**

In some countries, employees of WVI could be held personally liable in certain cases of substantiated harassing behaviour. Employees in Supervisory/Managerial positions at WVI could also be personally liable for failing to act upon a complaint made to them.

For WVI branches outside the United States, WVI will also take into consideration national law and consult appropriate local legal counsel as to the applicability of the national law. To the extent that the WVI policy is inconsistent with national law on this issue, national law should prevail. Where national law is consistent with the WVI policy or is silent, the WVI policy will apply.

### **C. Harassing Conduct - Non-employees:**

WVI expects its customers, vendors, contractors/consultants and partner organisations to refrain from harassing behaviour. These individuals are expected to meet the same behavioural standards as WVI

personnel. WVI may be liable to such individuals if they are harassed by a WVI staff member. Additionally, such individuals can report any harassing behaviour used toward them by a WVI staff member, to P&C/HR.

**D. Criminal Offenses:**

In the event of alleged criminal offenses (such as assault and battery) WVI will report the incident to appropriate local authorities, local law enforcement and/or diplomatic authorities.

**E. Reporting and Investigating Harassment Complaints:**

Typically, the following steps would be taken, but may be modified in the most appropriate manner for the circumstance and reflect local applicable laws.

Action	Responsibility
<p>If you believe that you have been harassed you should inform the individual directly that the conduct is unwelcome and must stop, if you are comfortable doing so. If you have questions or concerns about whether or how to address the person responsible for the conduct, consult with your local P&amp;C/HR Representative.</p>	Employee
<p>Promptly report the facts of the incident to:</p> <ul style="list-style-type: none"> <li>• <b>Both</b> your supervisor <u>and</u> local P&amp;C/HR Representative</li> </ul> <p>OR</p> <p><b>the World Vision's Integrity and Protection Hotline (IPH):</b></p> <p>To report an allegation by phone or on-line, one should visit the IPH website at:  <a href="http://www.worldvision.ethicspoint.com">www.worldvision.ethicspoint.com</a></p> <p>Here you may verify your local toll-free number, or make a report using the website.</p> <p><b>If you do not have access to the internet, please follow these instructions to contact the Hotline:</b></p> <p><i>From an outside line contact your local operator.</i></p> <p><i>Request a reverse charge or collect call to be placed to the United States, to the number below.</i></p> <p><i>When the operator asks who is placing the call, give your company name. Do not give your name.</i></p> <p><i>All reverse charge or collect calls, will be accepted by the EthicsPoint Contact Center. <b>+1-503-726-3990</b></i></p> <p><b>The Hotline is accessible 24 hours a day, and is confidential.</b></p> <p><b>Note: If the complaint concerns your supervisor, report the incident directly to your P&amp;C/HR Representative or the WVI Integrity &amp; Protection Hotline</b></p>	Employee
<p>To report an official complaint, please complete the <b>Harassment Complaint Form only if you are reporting the incident to your supervisor and Business Partner.</b> (If you report the complaint using the Hotline, please see note below) This will enable you to capture important and pertinent information about the complaint and enable the investigators to complete a thorough investigation.</p> <p><b>Note:</b> If you report a complaint using the Hotline, you will be asked to complete a questionnaire by phone or on-line. You will NOT need to complete the</p>	Employee

<p>Harassment Complaint Form referenced above. You will be given a unique report key to check back and follow-up after 5-6 business days for feedback or questions.</p> <p>After reporting such an incident to your supervisor and P&amp;C/HR Representative, the employee should receive an acknowledgement verifying that a complaint was received within five (5) business days.</p> <p>Once the complaint is received by the manager and or the national office HR/P&amp;C, it must be reported immediately (within 24 hours) to the Regional P&amp;C and the Regional P&amp;C then reports it to the GC Business Partner with a copy to GC Employee Relations</p> <p><b>If you do not receive an acknowledgement</b> within five (5) business days, notify GC Employee Relations or the Regional P&amp;C Director</p>	<p>HR/P&amp;C</p> <p>Manager and P&amp;C</p> <p>Employee</p>
<p>Ensure that the incident is investigated promptly and, depending on the results of the investigation, that the appropriate actions/ corrective measures up to and including termination, are taken.</p> <p><b>Note:</b> Supervisors must not independently investigate complaints of harassment. If a complaint is reported to a supervisor, then he or she must <b>immediately</b> report it to the P&amp;C/HR Representative</p>	<p>P&amp;C Business Partner, GC Employee Relations and the Legal Dept. in conjunction with national and regional P&amp;C/HR will appoint an individual or team to conduct the investigation.</p>

**During the investigation period,** the complainant and the alleged harasser and any individuals involved in the investigation, including witnesses are not to discuss the case with other co-workers in order for the investigation to remain objective and unbiased.

[Click here for Investigation Forms & Templates](#)

**F. INVESTIGATION RESULTS:**

P&C will inform the complainant and the alleged harasser as soon as reasonable of the findings of the investigation and the final determination.

- If harassment is not established there will be no permanent record made of the incident in the employee's file. However, the investigation report will be maintained in P&C. Appropriate counseling may be provided to both complainant and alleged harasser.
- If there is a reasonable basis to believe that harassment did occur, appropriate corrective action will be taken and full documentation will be kept on record.
- If it is established that knowingly and intentionally false allegations have been made, full documentation will be kept and corrective action will be taken against the complainant as appropriate.

**G. TREATMENT OF THE COMPLAINANT:**

The complainant will be treated respectfully and with dignity. Statements made by the complainant will be kept in appropriate confidentiality. The complainant will be:

- Given the opportunity to provide relevant information.

- Given the opportunity to participate in the investigation by providing names/identities of other witnesses and also recommend questions to be asked by the investigators during the investigation.
- If complainant desires, counseling may also be available

#### **H. TREATMENT OF THE ALLEGED HARASSER:**

The alleged harasser will be treated respectfully and with dignity. Statements made by the alleged harasser will be kept in appropriate confidentiality. The alleged harasser will be:

- Advised of the allegations, orally or in writing.
- Given the opportunity to provide relevant information and respond to specific allegations. This response may be made verbally or in writing.
- Given the opportunity to participate in the investigation by providing names/identities of other witnesses who may have knowledge of the specific allegations and also recommend questions to be asked by the investigators during the investigation.
- If alleged harasser desires, counseling may also be available

#### **I. RETALIATION:**

Retaliation against any employee for filing a complaint covered under this policy or assisting in the investigation of a complaint covered under this policy is prohibited. If you believe that you have been retaliated against for reporting a complaint or assisting in the investigation process, you should report the incident to your P&C/HR Representative or you may report it to the WVI Integrity and Protection Hotline.

#### **J. HARASSMENT PREVENTION:**

In a continued effort to prevent harassment, all employees will be educated about the harassment policy during new hire orientation.