

# Sexual Harassment Policy

Last Updated December 2024

## Policy brief & purpose

Our sexual harassment policy aims to protect our employees at Zen Educate from unwanted sexual advances and give them guidelines to report incidents. We will also explain how we handle claims and support victims.

We will not tolerate any form of sexual harassment in our workplace. Our culture is built on mutual respect and collaboration. Sexual harassment is a serious violation of these principles.

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

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.

## What is sexual harassment?

Sexual harassment has many forms. 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.

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

## Zen Educate's rules on sexual harassment

- No one has the right to sexually harass our employees.
- Sexual harassment is never too minor to be dealt with. Any kind of harassment can wear down employees and create a hostile workplace. In each case, we will hear the claim and take appropriate action against the offender.
- Sexual harassment is about how we make others feel. Many do not consider behaviours 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.
- We will not allow further victimisation of harassed employees. We will fully support employees who were sexually harassed and will not take any adverse action against them.
- Those who support or overlook sexual harassment are as much at fault as offenders. Management is especially 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 this to their line manager or Management Team.**

## How to report sexual harassment

If you are being sexually harassed (or suspect another person is being harassed), please report it to your line manager or the management team immediately. 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 line manager or a member of the Management Team. Once in the meeting, explain the situation in as much detail as possible. If you have any hard evidence (e.g. emails, text messages, photos or videos), forward it or bring it with you to the meeting.
- Send your complaint via email. If you address it to your line manager, please attach any evidence or information that can be used in the investigation. Your line manager or the Management Team will discuss the issue and contact you as soon as possible.

If you report the assault to the police, we will provide any possible support until the matter is resolved. In any case, we will ensure you are not victimised and that you have access to relevant evidence admissible in court.

## Inadvertent harassment

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

## Disciplinary action and repeat offenders

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

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

Please refer to our disciplinary procedure for more information:

[Zen Educate Policies & Procedures of Employment](#)

## Responsibilities

First and foremost, management 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, managers must act immediately. Managers should explain our company's procedures to the team members who made the complaint.

When we receive 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. Management should update this file with all future actions and conversations regarding this complaint.
- Launch an investigation. Investigations are to be carried out by a member of the People or Management Team.
- Check if there have been similar reports on the same person.
- 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 formal actions. Management 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.

- Arrange for mediation sessions with the two employees (harasser and perpetrator) to resolve the issue, if the harassed employee agrees.
- Launch a disciplinary process depending on the severity of the harassment. We will terminate employees who are found guilty in a court of law of sexually assaulting another employee, even if we have not conducted our investigation.

Management must not, under any circumstances, blame the victim, conceal a report or discourage employees from reporting sexual harassment.

## 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, we will work together to best support you.

## 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. At Zen Educate, we 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.