
POL 03029 Harassment-Free Work Environment

PURPOSE:

To outline behavioral expectations and anti-harassment protections, including sexual harassment, provided by FHI 360 in the work environment.

SCOPE:

This policy applies to all FHI 360 Personnel worldwide, and to Suppliers and Supplier Personnel to the extent set out below.

DEFINITIONS:

1. *Complainant* A person or party who makes a complaint under this policy.
2. *FHI 360 Personnel* FHI 360 employees, officers, members of the Board of Directors, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on behalf of FHI 360.
3. *Harassment* Policy items 1 and 2 below define harassment.
4. *Program Participant* Any adult or child who is served by an FHI 360 program, or has contact with FHI 360 Personnel, Suppliers, or Supplier Personnel in connection with or as a result of FHI 360's programs or business activities.
5. *Respondent* A person or party against whom a complaint is made under this policy.
6. *Supervisor* An employee of FHI 360 who is in a direct supervisory role over the work of one or more employees of FHI 360.
7. *Supplier* Any FHI 360 contractor, consultant, vendor, service provider, subcontractor, or subrecipient.
8. *Supplier Personnel* A Supplier's employees, interns, and fellows (paid or unpaid), volunteers, agents, and other individuals authorized to act on a Supplier's behalf.
9. *Work Environment* This includes work locations such as, but not limited to, FHI 360 offices, supplier or funder offices or facilities, during business travel, compound housing, on work field visits, deployment to humanitarian zones, and in all work interactions in the communities in which we serve. It includes on-site and off-site training workshop events, and conferences, and work-related social events such as office parties, off-site business lunches and dinners, and client or professional group entertainment events.

POLICY:

1. General Statement of Policy

- 1.1 All FHI 360 Personnel are entitled to work in a respectful and safe environment. To that end, FHI 360 does not tolerate any form of harassment in our work environment or work-related situations based on:
 - 1.1.1 race, color, ethnic, or national origin
 - 1.1.2 religion
 - 1.1.3 age

POL 03029**Harassment-Free Work Environment**

- 1.1.4 sex or sexual orientation
- 1.1.5 medical conditions
- 1.1.6 pregnancy, childbirth, and breastfeeding
- 1.1.7 nationality or citizenship
- 1.1.8 physical or mental disability, genetic information, or characteristics (or those of a family member)
- 1.1.9 protected U.S. military or U.S. veteran status
- 1.1.10 status as a victim of domestic violence, sexual assault, or stalking
- 1.1.11 any other class, status, or characteristic protected by applicable law
- 1.2 FHI 360 Personnel are strictly prohibited from harassing other FHI 360 Personnel, Supplier Personnel, Program Participants, or anyone else with whom they interact in work-related situations.
- 1.3 FHI 360 is committed to protecting FHI 360 Personnel from harassment, whether by other FHI 360 Personnel, a Supplier or Supplier Personnel, funders or funder personnel, Program Participants, or anyone else they interact with in work-related situations.
- 1.4 FHI 360 will take preventive measures, investigate harassment complaints, and take appropriate action to stop any harassment by or of FHI 360 Personnel.

2. Explaining Harassment and Conduct Constituting Harassment

- 2.1 Harassment is unwanted and unwelcome conduct based on any of the factors listed in section 1.1 when enduring the offensive conduct becomes a condition of continued employment, is severe and pervasive enough to interfere with a person's work performance, or creates a disrespectful, intimidating, hostile, degrading, humiliating, abusive or offensive work environment. Harassing conduct can be spoken, written (including online), non-verbal, or physical.
- 2.2 Harassment is usually repeated and persistent, but in some situations, a single severe incident may constitute harassment.
- 2.3 Harassers can be FHI 360 Personnel (including supervisors, direct reports, and co-workers) or people outside FHI 360, such as Supplier Personnel; employees of a Supplier's contractor, vendor, subcontractor, or subrecipient; employees of a funder; Program Participants; members of the communities FHI 360 serves; or anyone else they interact with in work-related situations.
- 2.4 FHI 360 Personnel can be affected by harassment and report it under this policy even if the conduct is directed at another individual.
- 2.5 Harassment is conduct that occurs at work or while working or is otherwise related to work. This includes work locations such as, but not limited to, FHI 360 offices, Supplier or funder offices or facilities, online through email, social media, or other electronic exchanges, during business travel, compound housing, on work field visits, deployment to humanitarian zones, and in all work interactions in the communities in which we serve. It includes on-site and off-site training workshop events, and conferences, and work-related social events such as office parties, off-site business lunches and dinners, and client or professional group entertainment events.
- 2.6 Sexual harassment is a specific form of harassment based on sex. Sexual harassment can occur regardless of the individuals' sex and sexual orientation, can occur between same-sex individuals as well as between opposite-sex individuals, and does not require that the harassing conduct be motivated by sexual desire. Sexual harassment can take different forms:

- 2.6.1 Hostile Work Environment: Conduct that is severe, pervasive, or continuous that has

POL 03029

Harassment-Free Work Environment

the purpose or effect of unreasonably interfering with an FHI 360 employee's work performance or creating an intimidating, hostile or offensive working environment, and

2.6.2 Quid Pro Quo Harassment: Unwelcome sexual advances, requests for sexual favors or a sexual or non-professional relationship, and other verbal and physical conduct of a sexual nature when submission to or rejection of this conduct is made either explicitly or implicitly a term or condition of employment or is used as the basis for decisions affecting the FHI 360 employee's employment.

2.7 Examples of prohibited harassment include:

2.7.1 derogatory or insensitive jokes, pranks, or comments

2.7.2 slurs or epithets, ridiculing or demeaning comments

2.7.3 direct or veiled threats of physical harm, violence

2.7.4 unwelcome sexual advances or invitations, whether verbal, physical or online, including social media

2.7.5 attempted or completed sexual assault or rape

2.7.6 non-verbal behavior such as staring, leering, or gestures

2.7.7 ridiculing or demeaning comments; innuendos or veiled threats

2.7.8 displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, social media posts, or drawings that are derogatory or sexual

2.7.9 offensive or unwelcome comments about appearance, other personal or physical characteristics, or offensive generalizations about people with disabilities (including physical, mental, emotional, or learning disabilities), age, sex, race, ethnicity, or nationality

2.7.10 unnecessary or unwanted bodily contact such as groping or massaging, blocking normal movement, or physically interfering with the work of another individual

2.7.11 preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward

2.7.12 threats or demands that a person submit to sexual requests as a condition of continued employment, to avoid some loss, or receive some benefit - in return for sexual favors

2.7.13 retaliation for sexual harassment complaints (see section 5)

2.8 The preceding list of examples is not exhaustive, and there may be other conduct that constitutes unacceptable harassment under this policy or applicable laws.

2.9 Furthermore, some unwanted conduct will not rise to the level of violating this policy but may still not be in keeping with FHI 360 Professional Standards of Conduct policy (POL 03003). In such instances, FHI 360 Personnel are urged to inform People and Culture (P&C) so that the conduct can be addressed.

3. Reporting

3.1 FHI 360 Personnel who have been subject to harassment, retaliation, or any other conduct prohibited by this policy, or who witness any such conduct, should promptly report the conduct, either orally or in writing, by contacting one of the following:

3.1.1 FHI 360 immediate supervisor, or, if the conduct involves the immediate supervisor, any other supervisor within their department

3.1.2 FHI 360 local People and Culture (P&C) representative or regional or departmental P&C Partner

3.1.3 FHI 360 Vice President of People Strategy, Talent, & Partnership or Chief People

POL 03029

Harassment-Free Work Environment

Officer (see FHI 360 Connect intranet for contact information) or

3.1.4 The Office of Compliance and Internal Audit (OCIA) via one of the following options:

- Email: Compliance@fhi360.org
- Website (anonymously or with your name) (<http://www.fhi360.org/anonreportregistry>)
- Confidential Ethics and Compliance Phone Line: +1 833 745 8886 (local airtime charges may apply)

- 3.2 Anonymous reports are generally more difficult to investigate due to limited information. FHI 360 Personnel are urged to provide as much detailed information as possible about the conduct, including, if possible, identifying people who were involved or who witnessed the conduct, so long as this will not put the persons identified at risk of immediate harm.
- 3.3 FHI 360 Personnel who are P&C staff, supervisors or hold a position at director level or above are required to promptly forward the report to OCIA or Headquarters P&C via the appropriate reporting mechanism in Section 3.1 above. Local P&C staff and Supervisors are strictly prohibited from investigating such reports or taking any action on their own. Failure to do so is a violation of this policy and could lead to disciplinary action, up to and including immediate separation of employment.

4. Support for Complainant

- 4.1 The safety of all those involved is paramount. FHI 360 and the persons involved in implementing this policy will take all reasonable steps to ensure that responding to harassment allegations does not jeopardize the safety of the Complainant or Respondent. Upon receipt of a complaint, FHI 360 will make an immediate assessment concerning the health and safety of the individuals involved and implement temporary remedies necessary for safety. During investigations, FHI 360 will take actions necessary to ensure the safety of Complainants.
- 4.2 FHI 360 Personnel may use company benefit programs such as medical coverage, available paid or unpaid leave, and Employee Assistance Programs for support, subject to eligibility requirements and benefit plan terms.

5. Non-Retaliation

- 5.1 FHI 360 has a separate policy prohibiting retaliation (Open Door and Non-Retaliation policy – POL 03004). FHI 360 strictly prohibits any retaliation against employees who participate in a harassment investigation, or report or complain about harassment or other violations of this policy or related procedures.
- 5.2 Retaliation occurs when someone penalizes or threatens to penalize another person for reporting or expressing an intent to report what they believe in good faith to be harassment or any other violation of this policy, assisting others in reporting harassment or policy violations, or participating in investigations under this policy.
- 5.3 Suspected retaliation should be promptly reported via the reporting mechanisms in section 3 of this policy.
- 5.4 FHI 360 Personnel who engage in retaliation will be subject to disciplinary action up to and including separation of employment or other relationship with FHI 360.

6. Investigation and Corrective Action

- 6.1 Upon receipt of a report of harassment, retaliation, or other violation of this policy, regardless of when the event(s) occurred, P&C determines an appropriate course of action based on the nature of the situation.
- 6.2 FHI 360 will make an immediate assessment concerning the health and safety of the

POL 03029**Harassment-Free Work Environment**

individuals involved, take steps to prevent further harassment and implement temporary remedies which may include separating the Complainant from the Respondent, placing the Respondent or the Complainant (at the complainant's request) on administrative leave, or other measures at FHI 360's discretion to ensure safety, confidentiality of the investigation, or allow for a thorough and uninterrupted investigation.

- 6.3 FHI 360 will conduct a sensitive, timely, and thorough investigation in an impartial manner that provides all parties with appropriate due process and maintains confidentiality to the extent possible (see section 7 below for detailed information about confidentiality).
- 6.4 Investigations will generally be conducted by the P&C department, but FHI 360 may hire outside investigators when deemed appropriate.
- 6.5 FHI 360 Personnel must cooperate fully with investigations and provide truthful information to investigators.
- 6.6 Investigations typically involve interviews of Complainant and Respondent and others who may have witnessed or otherwise have knowledge of the complaint. A review of relevant records, e-mails, communications, and other facts will be completed. Specific investigation steps will vary based upon the unique circumstances of each complaint.
- 6.7 Upon completion of the investigation, FHI 360 will review the evidence collected and determine whether harassment, retaliation, or other violations of this or other FHI 360 policies have occurred.
- 6.8 Where a policy violation has occurred, FHI 360 will take prompt corrective action reasonably calculated to end the harassment and to deter future harassment. Corrective action may range from coaching and counseling, performance improvement plans, warnings, transfers, reassignments, demotions, suspensions, or other disciplinary action up to and including immediate separation of employment.
- 6.9 FHI 360 will cooperate with law enforcement or other regulatory investigations and may be required to report credible allegations and violations to law enforcement and/or relevant FHI 360 funders. Such cooperation and reporting will be made under the guidance of the headquarters P&C department and OCIA and may include consultation with the Office of General Counsel.

7. Confidentiality

- 7.1 FHI 360 will keep harassment reports confidential to the extent possible to ensure the privacy of the individuals involved and to maintain the integrity and fairness of the investigation, while still fulfilling its obligations to investigate and end any harassing conduct.
- 7.2 Information learned through the investigation process will be disclosed only to those FHI 360 Personnel or other persons who "need to know" in order for FHI 360 to fulfill its obligations to investigate and take prompt action.
- 7.3 As required by local law, FHI 360 will provide necessary and appropriate disclosure to local enforcement agencies and will participate in investigations.
- 7.4 Nothing in this policy is intended as a guarantee of absolute confidentiality, nor is it intended to curtail employee rights under any applicable laws to discuss work-related matters.

8. Other Conduct That Violates This Policy

- 8.1 In addition to harassment, retaliation, and other prohibited conduct outlined above, it is also a violation of this policy for FHI 360 Personnel to:
 - 8.1.1 attempt to discourage, interfere, or impede any individual from reporting harassment
 - 8.1.2 discourage or impede any individual's participation in any investigation under this policy
 - 8.1.3 knowingly provide false information or make false claims to investigators

POL 03029**Harassment-Free Work Environment**

8.1.3.1. This policy recognizes that the fact a claim cannot be substantiated does not necessarily make it a false claim.

9. Expectations of Suppliers and Supplier Personnel

- 9.1 Suppliers and Supplier Personnel must refrain from any harassing conduct as outlined in this policy.
- 9.2 FHI 360 requires that Suppliers similarly uphold the principles of this policy to prevent harassment by and against Supplier Personnel. Failure to do so may result in termination of Supplier's contractual relationship with FHI 360.
- 9.4 FHI 360 requires that Suppliers and Supplier Personnel cooperate fully with investigations of policy violations and provide truthful information to investigators.

10. Consequences of Policy Violations

- 10.1 FHI 360 Personnel who violate this policy are subject to disciplinary action (see Employee Discipline Policy 03011) up to and including immediate termination of employment or other relationship with FHI 360. (See 6.8 above.)
- 10.2 Program Participants who violate this policy may be removed from FHI 360 programs and barred from participation in other FHI 360 programs.
- 10.3 Violations of this policy by Suppliers or Supplier Personnel may result in FHI 360 terminating the Supplier's contract with FHI 360. Further, FHI 360 may pursue any contractual or other legal remedies that may be available.

For policy interpretation or questions, please contact a P&C Partner.

RELATED DOCUMENTS:**1. Policies**

- Code of Ethics & Conduct
- POL 01032: Protecting Program Participants from Sexual Exploitation and Abuse
- POL 03003: Professional Standards of Conduct
- POL 03004: Open Door and No Retaliation
- POL 03005: Equal Employment Opportunity
- POL 03011: Employee Discipline
- POL 03035: Prohibited Workplace Relationships
- POL 03041: Violence-free Work Environment
- POL 03051: Administrative Leave

2. Standard Operating Procedures

N/A

3. Appendices

N/A

REFERENCES:

N/A

POL 03029 Harassment-Free Work Environment

REVISION HISTORY:

POL#	Date Reviewed DD MMM YYYY	Summary of Changes
446—Proc		New
446A— Proc	12/84	Changes reflected in 446A
446—Pol	10/98	Changes reflected in 446B
446—Pol	1/81	New
446A—Pol	12/84	Changes reflected in 446A
446B (combined)	10/98	Changes reflected in 446B
446C	1/01	Changes reflected in 446C
446C	4/03	Reviewed; no changes
446.03	12/04	Number change to 446.03
446.04	4/05	Changes reflected in 446.04
446.05	6/06	Changes reflected in 446.05
446.06	6/08	Re-write. Changes reflected in 446.06
446.07	Nov 2011	Major – updated language, actions, definitions, format
POL 03029	Dec 2012	New POL number for migration to EDMS
POL 03029	Nov 2013	Gender identity added
POL 03029	April 2015	Added Equal Employment Opportunity definition
POL 03029	Nov 2015	Major – updated language, actions, definitions, format, name change.
POL 03029	Jan 2019	Major – updated language, actions, definitions, format, name change.
POL 03029	04 JUN 2019	Revised definitions for FHI Personnel, Supplier, and Supplier Personnel, and updated policy content accordingly
POL 03029	20 JUL 2022	Add work environment definition; update consistent language with other safeguarding policies.
POL 03029	18 JUL 2023	Minor administrative change. Update to section 3.1.3 with titles vs. specific employee names.
POL 03029	27 NOV 2023	Minor administrative change from Chief Human Resources Officer to Chief People Officer in section 3.1.3.
POL 03029	21 APR 2025	Updated reporting mechanisms
POL 03029	MAY 2026	Updated for compliance. Departments and titles updated for consistency.