

Anti-Sexual Harassment Policy

Introduction

At Acuiti Labs, we are committed to fostering a workplace environment that is free from harassment, discrimination, and any form of behavior that undermines the dignity and respect of our employees. Our organization values openness, accountability, and fairness, and we strive to create a culture where every employee feels safe, valued, and supported.

This Anti-Sexual Harassment Policy is designed to provide clear guidelines on the prevention, reporting, and resolution of sexual harassment incidents in the workplace, in accordance with the applicable laws and regulations in each country we operate. Our goal is to ensure that all employees, regardless of location, have access to a work environment where their personal dignity is respected, and offensive behavior is not tolerated.



Scope and Applicability

This policy applies to all employees of Acuiti Labs, including full-time, part-time, temporary, and contractual staff, as well as interns. The policy is effective across all regions where we operate. Specific sections of this policy do not apply in the US. These are indicated and reference should be made instead to the US **addendum**.

Company's Commitment

Acuiti Labs takes a zero-tolerance approach to sexual harassment and discrimination. We are committed to:

- Preventing all forms of sexual harassment and providing a safe workplace for every employee.
- Complying with local laws and regulations governing sexual harassment in the workplace.
- Ensuring that all incidents of sexual harassment are taken seriously, promptly investigated, and resolved in a fair and transparent manner.

Purpose of the Policy

The purpose of this policy is to:

- Define sexual harassment and provide clear examples of prohibited conduct.
- Establish a framework for reporting and addressing complaints of sexual harassment.
- Ensure compliance with jurisdiction-specific laws on sexual harassment.
- Foster an inclusive and respectful workplace culture by providing training and resources to prevent sexual harassment.

Legal Framework

At Acuiti Labs, we recognize the importance of adhering to the legal standards governing workplace sexual harassment in each country we operate. Our Anti-Sexual Harassment Policy ensures compliance with the relevant legal frameworks to create a safe and respectful workplace environment across all regions.

General Definition of Sexual Harassment

Sexual harassment in the workplace is defined as any unwelcome behavior of a sexual nature that creates an intimidating, hostile, or offensive work environment. Harassment may manifest in verbal, non-verbal, or physical forms, and can involve actions that demean, intimidate, or degrade an individual based on their gender, sexual orientation, or other protected characteristics.

Sexual harassment includes any form of unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- It affects an individual's employment conditions.
- It interferes with an individual's work performance.
- It creates an intimidating, hostile, or offensive work environment.

Harassment can be initiated by supervisors, colleagues, or even third parties, such as clients or vendors.

Types of Prohibited Conduct

Acuiti Labs is committed to maintaining a workplace free from sexual harassment, where every employee can work without fear of discrimination, intimidation, or any form of inappropriate behavior. This section outlines the types of prohibited conduct under the Anti-Sexual Harassment Policy, but it is not exhaustive. All forms of

sexual harassment, whether verbal, non-verbal, or physical, are strictly prohibited and will be dealt with seriously through disciplinary actions as outlined in company policy.

Sexual harassment can manifest in various forms, which are categorized below:

Verbal Harassment

Verbal harassment includes any unwelcome comments, remarks, or conversations that have a sexual connotation or are based on gender, sexual orientation, or other protected characteristics. This form of harassment can create a hostile and uncomfortable work environment.

Examples of verbal harassment:

- Making sexually explicit jokes or comments.
- Asking inappropriate questions about an employee's personal life or sexual experiences.
- Repeated, unwelcome advances or requests for dates.
- Using derogatory or sexual language to refer to someone.
- Comments or gossip about an individual's appearance, dress, or body that are inappropriate or offensive.
- Verbal threats or pressure to engage in sexual activity.

Non-Verbal Harassment

Non-verbal harassment refers to actions or behaviors that do not involve spoken words but still create a sexually hostile or intimidating work environment. These behaviors often rely on visual or physical cues to harass or intimidate an employee.

Examples of non-verbal harassment:

- Displaying sexually suggestive or explicit images, posters, or screensavers in the workplace.
- Making sexually suggestive gestures, such as leering or winking.
- Sending inappropriate or sexually explicit emails, texts, or social media messages.
- Deliberate and offensive staring or leering at someone's body.
- Circulating offensive or inappropriate jokes, memes, or videos through emails or social media.

Physical Harassment

Physical harassment involves any unwelcome physical contact or intimidation that creates an offensive, hostile, or intimidating work environment. This can range from seemingly minor physical actions to more aggressive behaviors.

Examples of physical harassment:

- Unwanted touching, hugging, kissing, or groping.
- Blocking someone's path in an intimidating or suggestive manner.
- Physical gestures, such as massaging someone's shoulders or brushing against their body without consent.
- Attempting to engage in sexual activity through force or coercion.

- Assault or other forms of physical violence related to sexual advances.

Quid Pro Quo Sexual Harassment

"Quid pro quo" (meaning "this for that") sexual harassment occurs when submission to or rejection of unwelcome sexual advances is made a condition for employment decisions. This type of harassment can involve a power imbalance where the harasser uses their position of authority to demand sexual favors in exchange for job benefits. This type of harassment can be created by colleagues, subordinates or even third parties such as clients or vendors.

Examples of quid pro quo harassment:

- A manager offering a promotion, raise, or favorable assignment in exchange for sexual favors.
- Threatening to demote, fire, or penalize an employee for rejecting advances.
- Conditioning performance reviews or job assignments on an employee's willingness to engage in sexual activity.

Hostile Work Environment

Hostile work environment harassment can occur when unwelcome sexual behavior or conduct creates an intimidating, hostile, or offensive work environment. This type of harassment can be created by colleagues, subordinates, or even third parties such as clients or vendors.

Examples of hostile work environment harassment:

- Persistent and inappropriate comments about a person's gender, sexual orientation, or appearance.
- Displaying explicit materials or engaging in sexual discussions that offend others.
- Consistently undermining or belittling someone because of their gender or sexual orientation.

- Spreading rumors or gossip about someone's personal relationships.

Cyber Harassment and Social Media Misconduct

Cyber harassment refers to using electronic communications, such as emails, instant messaging, or social media platforms, to harass or intimidate someone in a sexual manner. With the rise of digital interactions, cyber harassment is increasingly common and equally prohibited.

Examples of cyber harassment:

- Sending unsolicited sexually explicit images, videos, or messages.
- Engaging in online stalking or making sexually suggestive comments on social media platforms.
- Posting derogatory comments or rumors about a co-worker's personal or sexual life on social media.
- Using company resources (e.g., work emails or chat platforms) to distribute inappropriate content.

Cultural Considerations and Global Applicability

It is important to note that behaviors considered harassment in one cultural or regional context may not always be interpreted the same way in another and vice versa. However, Acuiti Labs takes a zero-tolerance approach to any form of harassment regardless of cultural norms or local customs. All employees are expected to conduct themselves in a manner that upholds the company's commitment to a harassment-free workplace, with sensitivity to regional and cultural differences.

Consequences for Engaging in Prohibited Conduct

Any employee found to be engaging in prohibited conduct as outlined in this policy may be subject to disciplinary actions, which may, depending on country-specific laws, include:

- Verbal or written warnings.
- Mandatory training or counseling.
- Suspension or demotion.
- Termination of employment.
- Legal action, where necessary.

Confidentiality in the Complaint Process

Across all regions, Acuiti Labs is committed to maintaining the confidentiality of all parties involved in a sexual harassment complaint made in good faith. Investigations will be conducted discreetly, and it is the company's expectation that any disclosures made during the investigation process will be limited to those necessary for conducting a thorough inquiry. The US addendum provides further detail on the applicability of this in the US.

Protections Against Retaliation

Retaliation against employees who report in good faith harassment or participate in an investigation is strictly prohibited. Retaliation can include demotion, termination, negative performance reviews, or any other adverse action. Employees who believe they are facing retaliation are encouraged to report the matter immediately through the available complaint mechanisms in their respective regions.

Any complaints found to have been made not in good faith will be addressed subject to country-specific laws, in accordance with the disciplinary policy.

Reporting Procedures

Acuiti Labs is committed to providing a safe and respectful workplace environment for all employees. To ensure that incidents of sexual harassment are promptly and effectively addressed, we have established clear reporting procedures that empower employees to raise concerns without

fear of retaliation. This section outlines the steps employees should follow to report incidents of harassment, ensuring confidentiality, fairness, and compliance with local laws. These procedures do not apply in the US.

Internal Reporting

Employees are encouraged to report any incidents of sexual harassment immediately through the appropriate internal channels. Timely reporting is essential to ensure a thorough investigation and resolution.

Steps to Report Harassment:

Identify the Behavior: If you experience or witness behavior that constitutes sexual harassment, note the details of the incident, including dates, times, locations, and any witnesses.

Informal Resolution (Optional): If you feel comfortable doing so, you may address the behavior directly with the harasser and request that it stop. This step is optional and should only be taken if you feel safe.

Submit a Complaint: Report the incident to your immediate supervisor, HR department, or designated compliance officer, unless country-specific laws provide a specific grievance redressal mechanism for inquiring into such complaints. To assist with the investigation, the complaint should be submitted in writing, outlining the nature of the harassment, the individual(s) involved, and any supporting evidence.

Country-Specific Reporting Guidelines:

You should report the incident to the HR department as soon as possible via emailing hr@acuitilabs.com or reaching out to the HR team member directly.

For India: Submit the complaint to the Internal Committee (IC), which is mandatory under the **POSH Act**. Complaints should be made within three months of the incident (although the IC can

extend the timeline for making such complaints by another three months in case of genuine circumstances preventing the complaint being filed sooner).

Confidentiality and Privacy

Acuiti Labs treats all complaints of sexual harassment with the utmost confidentiality. The details of the complaint, investigation, and any subsequent actions will be shared only with those who need to know in order to carry out their responsibilities.

Confidential Investigations: The company will conduct the investigation in a confidential manner to the greatest extent possible. Information may be shared with the accused, witnesses, or other relevant parties as needed for the investigation.

Non-Disclosure: Subject to country-specific laws, employees involved in the complaint process, including the complainant, the accused, and witnesses, are expected to maintain confidentiality and refrain from discussing the matter outside the investigation process. This expectation is addressed separately in the US addendum.

Support for Complainants

Acuiti Labs is committed to supporting employees who experience or witness sexual harassment. Employees who come forward with complaints in good faith will not face retaliation or negative consequences for reporting harassment.

Non-Retaliation: The company strictly prohibits any form of retaliation against employees who report harassment or participate in an investigation. Any employee found to be retaliating will face disciplinary action in accordance with local country laws.

Access to Resources: Complainants may have access to support services, including counselling through Employee Assistance Programs (EAPs).

Timeframes for Reporting

Employees should report incidents of harassment as soon as possible after the event to ensure timely investigation and resolution.

Investigative Process

Once a complaint is received, the company will initiate an investigation. Acuiti Labs reserves the right to deviate from this process as necessary and in accordance with local laws at all times. This process does not apply in the US.

Steps in the Investigation:

Acknowledgment of Complaint: The company will acknowledge the receipt of the complaint and initiate an investigation.

Interviews: The complainant, the accused, and any witnesses will be interviewed as part of the investigation. Both parties will have the opportunity to present evidence.

Documentation: Relevant documentation, including emails, messages, and any other evidence, will be collected and reviewed.

Resolution: Once the investigation is complete, the investigator (or committee, as applicable) will submit a report with their findings and recommendations for corrective actions.

Corrective Actions: Based on the findings, the company may take actions such as issuing warnings, providing training, or taking disciplinary measures, including termination if warranted.

Outcome and Appeals

After the investigation is completed, the complainant and the accused will be informed of the outcome. If either party is dissatisfied with the resolution, they may appeal.

Investigation and Resolution Process

Acuiti Labs is committed to thoroughly investigating all complaints of sexual harassment and ensuring a fair, impartial, and timely resolution. This section outlines the steps taken once a complaint is made, from the initiation of the investigation to the implementation of corrective actions. The investigation process is designed to protect the rights of all parties involved and comply with local legal frameworks. However, Acuiti Labs

reserves the right to depart from these procedures where appropriate from time to time and in accordance with local country laws. This guidance does not apply in the US.

Initiating the Investigation

Once a complaint of sexual harassment is submitted, the company will acknowledge the receipt of the complaint and begin the investigation process. The investigation is handled with confidentiality, and the complainant and the accused will be informed of their rights throughout the process.

Steps to Initiate:

Acknowledge Receipt: The HR department or the designated investigating body (such as the Internal Committee in India) will confirm receipt of the complaint in writing to the complainant and inform them of the next steps.

Assign an Investigator: An impartial investigator or committee will be appointed to handle the investigation. In India, the Internal Committee (IC) will take charge. In other regions, the HR department or another investigator may be assigned based on the facts of the case.

Inform the Accused: The accused individual will be notified of the allegations and given the opportunity to respond. They will also be informed of the investigation process and their rights.

Conducting the Investigation

The investigation will be conducted in a fair and impartial manner, ensuring that both the complainant and the accused have the opportunity to present their side of the story. All evidence and witnesses relevant to the complaint will be reviewed.

Investigation Steps:

Interviews with Parties Involved: The investigator will conduct interviews with the complainant, the accused, and any witnesses to gather relevant information. Both parties will have the opportunity to submit evidence (e.g., emails, messages, recordings).

Review of Evidence: All documentation, including written records, emails, text messages, or any physical evidence, will be carefully reviewed by the investigator.

Documentation of Findings: A detailed record of the investigation will be maintained, including the statements of the complainant, the accused, and witnesses, as well as any other evidence gathered.

Timeline for Investigation

The investigation will be conducted in a timely manner to ensure that it does not disrupt the workplace for an extended period. Some jurisdictions have specific guidelines for the duration of the investigation process. For example:



Netherlands: Investigations should be completed as soon as possible, typically within 60-90 days, depending on the complexity of the case.



case.

India: Under the POSH Act, the Internal Committee (IC) must complete its inquiry within 90 days of receiving the complaint, subject to cooperation by the parties to the inquiry and the complexity of the

Local requirements should always be met.

Maintaining Confidentiality

Subject to country-specific laws, confidentiality is a key component of the investigation process. Acuiti Labs ensures that the details of the investigation are shared only with those directly involved in resolving the case.

Restricted Access: Information related to the complaint and the investigation will only be shared with the complainant, the accused, the investigator, and relevant HR personnel. In some cases, external legal advisors or representatives may also have access to certain information, but confidentiality will be maintained.

Witness Confidentiality: Subject to country-specific laws, witnesses interviewed during the investigation are also expected to maintain confidentiality. Breaches of confidentiality may result in disciplinary action.

Public Disclosure: No public disclosures will be made unless required by law. The findings and outcomes of the investigation will be shared only with those involved in the resolution process.

Fairness and Impartiality

To ensure a fair process, the investigator(s) will remain neutral and impartial throughout the investigation. Acuiti Labs is committed to protecting the rights of both the complainant and the accused, and both parties will have equal opportunities to present their case.

Key Principles of Fairness:

Impartial Investigator: The investigator will have no prior involvement or bias in the case. In some situations, external investigators may be brought in to ensure impartiality.

Equal Opportunity: Both the complainant and the accused will have an opportunity to present their side, provide evidence, and call witnesses.

No Presumption of Guilt: The accused is presumed innocent until the investigation is complete and findings are made based on evidence.

Resolution and Corrective Actions

Once the investigation is complete, a report will be prepared with the findings and recommendations for corrective actions. The resolution process involves determining whether harassment occurred and implementing appropriate disciplinary measures if necessary.

Resolution Steps:

Investigation Report: The investigator will prepare a written report summarizing the evidence, findings, and conclusions of the investigation. The report will include recommendations for corrective actions, if any.

Decision on Corrective Actions: Based on the investigation report, HR or the relevant person or authority (e.g., the IC in India) will decide on the appropriate disciplinary actions. This may include warnings, suspension, termination of employment, or other corrective measures.

Corrective and Disciplinary Actions

Acuiti Labs takes sexual harassment complaints seriously and will implement disciplinary actions based on the severity of the offense. Corrective actions will be designed to both remedy the situation and prevent future

incidents. Acuiti Labs reserves the right to implement any disciplinary action it deems appropriate, even for a first offense.

Possible Disciplinary Actions:

Verbal or Written Warning: For minor infractions, the accused may receive a formal warning.

Suspension: Temporary suspension may be imposed if the offense is severe or if the investigation is ongoing. Suspension is not used as a disciplinary sanction in the UK.

Mandatory Training: The accused may be required to undergo additional training on workplace conduct and sexual harassment.

Termination of Employment: In cases where the harassment is severe, the company may terminate the employment of the harasser.

Legal Action: If the behavior violates local laws, legal action may be taken, where appropriate, in addition to internal disciplinary measures.

Depending on specific facts and circumstances, the Company retains the right of flexibility in determining appropriate discipline and the option of imposing immediate and strong discipline up to and including suspension and/or immediate termination of employment. The Company and its employees recognize that some violations are more serious in nature. Even a first violation may result in suspension and/or discharge.

Appeals Process

Both the complainant and the accused have the right to appeal the decision if they believe the investigation was unfair or the resolution was inadequate. Appeals must be made within the timeframe specified in the outcome letter.



Appeals Process by Jurisdiction:

Each jurisdiction may have a different appeals process. For example:

UK: Employees can appeal the decision internally.

Netherlands: Employees may appeal the internal decision.

India: Under the POSH Act, both parties have the right to appeal the IC's decision to a court or tribunal within 90 days.

Retaliation Protections

At Acuiti Labs, we are committed to fostering a workplace environment where employees feel safe to report incidents of sexual harassment or participate in investigations without fear of retaliation. Retaliation against individuals who report sexual harassment, assist in an investigation, or oppose discriminatory practices is strictly prohibited. This section outlines the protections in place to ensure that employees can engage in the reporting process without suffering adverse consequences, as well as the remedies available if retaliation occurs.

Definition of Retaliation

Retaliation occurs when an employer, supervisor, or colleague takes adverse actions against an employee as a result of their involvement in reporting sexual harassment, participating in an investigation, or opposing behavior that violates workplace policies or legal standards. Retaliation can take many forms, including but not limited to:

Demotion or Termination: Unjustly lowering an employee's rank, firing them, or taking punitive actions after they report sexual harassment.

Negative Performance Reviews: Giving unfair performance appraisals as a result of the employee's complaint

or participation in an investigation.

Changes in Job Assignments: Assigning undesirable tasks, reducing responsibilities, or changing job roles to punish the individual.

Harassment or Intimidation: Bullying, exclusion, or creating a hostile work environment following a complaint.

Reduction in Benefits or Pay: Unfairly withholding raises, promotions, or other financial rewards.

Retaliation can be subtle or direct, but any form of punitive action taken as a consequence of reporting or participating in the complaint process is unacceptable and will be addressed by the company.

Reporting Retaliation

Employees who believe they have been subjected to retaliation after reporting sexual harassment or participating in an investigation are encouraged to report the incident immediately. Reports will be investigated in accordance with the reporting and investigation procedures above.

Remedies for Victims of Retaliation

If retaliation is found to have occurred, Acuiti Labs will take steps to remedy the situation and ensure that the employee is not adversely affected by their actions in reporting harassment or participating in an investigation.

Possible Remedies:

- **Reinstatement:** The employee may be reinstated to their previous position if they were unjustly demoted or terminated.
- **Compensation:** In some cases, the employee may be entitled to compensation for lost wages, bonuses, or benefits.
- **Corrective Actions:** Any unfair performance reviews or disciplinary records resulting from retaliation will be corrected or removed from the employee's file.

Employee Education on Retaliation Protections

To ensure all employees are aware of their rights and protections against retaliation, Acuiti Labs will provide regular training and education as part of its sexual harassment prevention programs. Employees will be informed about:

- **Their Right to Report Sexual Harassment:** Employees will be reminded that they have the right to report sexual harassment without fear of retaliation.
- **Reporting Channels for Retaliation:** Employees will be provided with clear guidelines on how to report any incidents of retaliation and the steps involved in the investigation process