

1. PURPOSE

At INDEVCO, we are committed to maintaining and developing our corporate culture and respecting the 7 core values which have guided our business since the foundation. The Group's success is tightly woven into the core values which influence the way "we do" our job and the way we interact with one another in line with the highest standards of professionalism, respect and goodwill.

The purpose of putting in place an anti-harassment policy is that each employee should expect and has the responsibility to support a workplace and culture free of harassment, discrimination, abusive conduct and retaliation.

2. DEFINITIONS

- **Policy:** Anti-Harassment Policy
- **Company:** All INDEVCO Group of companies in Lebanon
- **Employee(s):** every female and male employed by the company and belong to one of those categories: employee, trainee, daily hire, contractual worker, consultant or advisor
- **Investigation Committee:** A group of individuals from different backgrounds appointed by the management on case-by-case basis, to look into harassment concerns

3. SCOPE

This policy is applicable to all INDEVCO Group departments, operating units and service entities including but not limited to applicants, employees including trainees, co-workers, supervisors and managers, customers and other third parties not mentioned above and have direct contact with the Company and are physically present at its premises.

4. RESPONSIBILITIES

It is the responsibility of the HR to ensure proper implementation of this policy without any exceptions.

5. HARASSMENT DEFINITION

Harassment is unwelcome and unusual conduct. It includes any unwanted physical, verbal or non-verbal behavior that offends or humiliates another individual.

It is a form of offensive or abusive behavior causing physical, emotional or professional harm. It can be one shocking incident or a series of recurring less shocking incidents.

Harassment creates a threatening, unfriendly, offensive, or abusive work environment. It can range from extreme and exaggerated forms of violence, offensive language, threats, or physical touching to less obvious actions like mocking or teasing a

colleague as per a pre-determined “Protected Employee Characteristic” (Refer to section 6).

It is the responsibility of the investigation committee to assess whether an incident is considered harassment or not. The actions that do not fall under above definition are not harassment. For example:

- A disagreement or argument
- Feedback
- Minor annoyances or grievances (One inappropriate joke or remark, playing favorites...)
- Any behavior that is deemed normal among a group of people

6. PROTECTED EMPLOYEE CHARACTERISTICS

Harassment is considered an illegal form of discrimination when the abuse or misconduct is tackling the following “protected employee characteristics” by law such as:

- Race
- Age
- Gender
- Disability (mental or physical)
- Nationality
- Pregnancy
- Marital status
- Social Status
- Educational Status

Harassment must be based on a “protected characteristic” to be considered illegal. However, our policies prohibit workplace harassment or bullying of *any* kind.

7. HARASSER AND VICTIM

Anyone can be a harasser or a victim including:

- Female or male
- Applicants
- Employees
- Trainees
- Supervisors and managers
- Daily workers
- Independent contractors
- Customers, suppliers and other third parties that have direct relationship with the company and/or are physically present at its premises

8. TYPES OF WORKPLACE HARASSMENT

Types of harassment include:

- **Verbal Harassment**
 - Offensive jokes about appearance, or other personal or physical characteristics that go beyond normal behaviors
 - Insults, put-downs, and disrespectful language
 - Threats, ridicule, humiliation, or intimidation
 - Yelling, shouting, or screaming
 - Spreading gossip to damage the reputation of someone
- **Non-verbal Harassment**
 - Making vulgar, sexual, or offensive gestures
 - Hostile staring or other nonverbal behaviors
 - Suggestive winking, or watching
- **Physical Harassment**
 - Pushing or grabbing a person
 - Physically threatening a person
 - Assault or attempted assault
 - Unnecessary or undesired bodily contact such as blocking movement
- **Visual Harassment**
 - Sharing inappropriate or offensive videos, photos, or other illustrations
 - Having offensive screensavers or posters in the workplace
 - Sending offensive or sexually explicit texts, emails, or messages
 - Cyberbullying

- **Sexual Harassment**

Sexual harassment is unwanted, unacceptable and unlawful behavior (Lebanese Law no. 205) of a sexual nature that causes a breach of physical privacy and emotions. It can be physical, verbal or non-verbal and includes, but is not limited to the following:

- **Quid Pro Quo:** Threats or demands that an individual perform sexual requests as a condition of continued employment or as a condition to offer promotions or other employment-related benefits or to remove a punishment
- **Hostile Work Environment:** is the type of sexual harassment that occurs when there is a recurring or pervasive unwanted sexual remarks, propositions, requests, or other similar conduct. It also occurs when there is verbal or physical behavior that is sexual in nature, even if it does not result in job-related consequences.

Examples of Sexual Harassment:

- Repeated and unwanted public and private flirting, requests for dates, or other forms of sexual attention

- Asking about a person's sex life
- Making sexist or sexual jokes, or comments
- Unwanted kissing, hugging, examining, or touching
- Sending photos, videos, emails, or messages of sexual nature

9. STANDARDS OF CONDUCT

INDEVCO holds employees to the highest standards of ethics and conduct to maintain a healthy and collaborative environment.

The company expects employees to work cooperatively with co-workers, clients and visitors and maintain basic standards of mutual respect and we assume the obligation to maintain a work environment free of illegal harassment.

Each employee has an obligation to comply with this policy and is expected to foster a workplace culture that is free of harassment, discrimination, abusive conduct and retaliation. If an employee observes or becomes aware of such improper conduct that might violate this policy, they should immediately report it (*Refer to section 11.1 on more details how to address your concerns*).

10. RETALIATION

INDEVCO prohibits retaliation for raising a concern about a violation of policy or participating in an investigation relating to a violation of policy.

Retaliation means taking a hostile/ threatening action against an employee as a result of:

- reporting or
- expressing an intent to report or
- **assisting another employee** in a harassment case or
- participating in the investigation of a harassment incident.

A disciplinary action for such a conduct will be applicable and it may include, but not limited to, verbal/written warning, suspension, transfer or termination.

11. CONCERNS AND INVESTIGATION PROCEDURES

11.1 Addressing a concern

An employee can raise his concern about improper conduct under this policy to:

- Their Direct Manager or someone else in their reporting chain
- Any other manager outside of their reporting chain whom they feel comfortable talking to
- Their BU HR or Divisional HR manager
- An investigation committee, in writing – Email address from **a company email:** IndevcoFamily@indevcogroup.com

In the event an employee addresses a concern to anyone, it is the **obligation of this individual to relay the message in writing** (see above email address) to the investigation committee for further examination. **A copy of the email will reach the CEO Office.**

Please provide as much information as possible about the reported concern allowing the investigation committee address it effectively and quickly.

If the employee is not sure that the behavior constitutes harassment, he/she should talk to their manager or their HR or any other trusted employee / friend about it, so he/she can reach a decision about how to move forward.

The company will protect any employee, who may report any concerns or harassment he is exposed to. However, it is considered a violation of the rules of Professional Conduct to deliberately make false accusations or lie in order to harm the reputation or dignity of others.

The honest reporting does not mean that the employee who reported is right, but he/she must be certain that the stated information is true.

11.2 Who Handles the Concern

A group of four individuals is appointed to investigate cases of harassment in the workplace and to take appropriate decision and disciplinary action. **Those individuals will be selected on case-by-case basis depending on the severity of the case being investigated.**

Investigations will be conducted in an **impartial, fair, timely, confidential and thorough manner**. In many instances, a committee representative will be your first point of contact. No matter how a concern is reported, the company will make sure it is addressed properly.

While every case is different, the process, the investigation committee follows, for handling any concern, is the same (Refer to section 11.3).

11.3 Handling a Concern

The investigation committee tries to look into and resolve workplace concerns as quickly as possible: as they do not want to have an uncomfortable situation that continues to exist.

As the committee looks into the issue, it is possible they might need to come back to the harassment victim and others involved to get additional information. They want to make sure that the collected information is accurate and as complete as possible to fairly assess the situation.

Once the committee looking into your concern has gathered the information they need, they will reasonably & objectively conclude what they believe happened and whether any policies were violated.

The committee will work with the concerned managers to inform them on the appropriate actions to take.

When the inquiry has been completed, someone from the investigation committee and/or direct manager will follow up with the harassment victim, as well as the individual about whom the complaint was made, to share the outcome.

11.4 Confidentiality

INDEVCO commits to providing safe spaces for employees to surface concerns where:

- The concerned individuals (the direct manager or the investigation committee) are always obligated in making all necessary arrangements to prevent information leakage, to fully preserve any confidential or internal information, and to ensure that none of it is announced or disclosed to any other party inside or outside the company.
- The investigation committee makes sure to treat the inquiries as confidentially as possible, only disclosing information on a need-to-know basis thus protecting the identity of the victim and the harasser at the same time regardless of final decision based on findings.

11.5 Disciplinary Actions

At the end of the investigation, the relevant committee can take the appropriate disciplinary actions based on the gravity of the act and along the following:

- A verbal warning
- A written warning
- Impact to performance ratings
- Impact to compensation
- Suspension
- Transfer
- Termination of employment

11.6 After Closing a Harassment Concern

After closing a harassment concern, if the employees involved feel they are being retaliated against for raising the issue or participating in the investigation of a specific incident, please let the investigation committee know immediately by sending an email from **a company email** to IndevcoFamily@indevcogroup.com.

12. CONCLUSION

The shared information at the end of the process is limited to protect the confidentiality and privacy of all parties involved. It is understandable that not everyone may be happy with the outcome every time. In such situations, there can be a variety of

perspectives and the investigation committee tries to take them all into account when looking into a concern.

We will do our best to have BU HR check-in with the concerned employees, to see how things are going after a harassment case has been resolved.

Finally, the purpose of setting an anti-harassment policy at the workplace is due to the fact that it is no longer permissible to consider any minor misconduct as normal, reaching up to sexual harassment and other issues that are forbidden to talk about (Taboo). Therefore, under this policy the company secures protection for the person who reports a harassment case and punishes the harasser, regardless of his professional, social status or affiliations within the company.

We want INDEVCO to be a great place to work, if you see or experience something that does not feel right, please speak up.