

POLICY AGAINST PSYCHOLOGICAL AND SEXUAL HARRASSMENT

ADOPTED BY THE BOARD OF
DIRECTORS ON
9 DECEMBER 2025



TABLE OF CONTENTS

1. GOAL OF THE POLICY AGAINST PSYCHOLOGICAL AND SEXUAL HARASSMENT	3
2. CECI'S COMMITMENT	3
3. SCOPE OF APPLICATION	4
4. DEFINITIONS	5
5. ROLES AND RESPONSIBILITIES	7
6. GUIDING PRINCIPLES	9
7. PREVENTION PROGRAM	10
8. MECHANISMS FOR MANAGING COMPLAINTS AND REPORTS	10
9. ADMISSIBILITY ANALYSIS	13
10. PROCESSING ADMISSIBLE COMPLAINTS AND REPORTS	15
11. DOCUMENT RETENTION	18
12. MONITORING AND EVALUATION	18
13. REQUEST FOR INFORMATION	18
ACKNOWLEDGEMENT	19
APPENDIX A: DEFINITION OF HARASSMENT	20
APPENDIX C HARASSMENT COMPLAINT OR REPORT FORM	23

1. GOAL OF THE POLICY AGAINST PSYCHOLOGICAL AND SEXUAL HARASSMENT

Committed alongside its partners, CECI works for inclusive and sustainable economies, where women and young people fully exercise their rights and leadership in pursuing climate-resilient economic opportunities, education and health. CECI does this by building relationships based on values of cooperation, respect, equality, integrity and commitment.

Within this framework, the goal of this policy is to:

- Prevent and eliminate all forms of harassment in the workplace, whether psychological or sexual.
- Foster an organizational culture based on fairness, respect, integrity and responsibility.
- Put in place clear, accessible and confidential mechanisms for reporting and dealing with any problematic harassment situations.
- Ensure the safety, well-being and integrity of people in all CECI locations and contexts.

Please note that this policy complements and reaffirms the general obligations also established in the *Policy on the Prevention of Sexual Exploitation and Abuse* as well as in [CECI's Code of Conduct, Rules of Ethics & Conflicts of Interest](#).

2. CECI'S COMMITMENT

CECI is committed to preventing and eliminating all forms of psychological or sexual harassment in all its workplaces, regardless of the country or context in which it operates. CECI strives to provide safe, respectful and harassment-free working environments where all individuals can thrive with dignity.

To achieve this commitment, CECI implements the following measures:

- Foster an organizational culture based on respect, inclusion, collaboration, gender equality and individual and collective responsibility for preventing harassment ;
- Provide training opportunities and establish an awareness-raising mechanism for all those who work with CECI, including specific modules for those who receive and handle harassment reports ;
- Put in place clear, accessible and confidential reporting mechanisms, adapted to local realities ;
- Deal quickly and fairly with any situation brought to the organization's attention, while respecting confidentiality and the people involved ;
- Offer safe, caring support to those concerned ;
- Ensure that appropriate measures are systematically applied in all confirmed cases of harassment, in accordance with the policies in force.

CECI acts with rigor and integrity to ensure the well-being of its staff, volunteers, partners, and of all stakeholders who work with the organization internationally. It also promotes, alongside governments and other stakeholders, integrity and respect for the dignity of the populations and communities with and for which it works.

CECI commits to disseminate this policy to its staff, volunteers and all other stakeholders.

3. SCOPE OF APPLICATION

The policy against psychological and sexual harassment applies to and aims to protect:

- All staff and volunteers of the organization, including interns and service providers ;
- Members of the Board of Directors ;
- All those who participate in the organization's projects and programs ;
- Consultants and subcontractors ;
- Anyone who interacts with CECI in the course of its activities.

The policy applies in all of the following contexts :

- At all CECI workplaces, as well as outside of them ;
- On and off company time ;
- During work-related travel ;
- During work-related social activities (conventions, happy hours, celebratory events, etc.) ;
- In business communications, by whatever means (in person, telephone, social media, etc.);
- In all other work-related contexts, including teleworking.

4. DEFINITIONS

Psychological harassment	Vexatious behaviour involving repeated hostile or unwanted conduct, verbal comments, acts or gestures that violate the dignity or the psychological or physical integrity of the person concerned and that result in a harmful workplace or environment. A single serious act may also constitute psychological harassment if it has a harmful and lasting effect on the person concerned. Harassment also includes any form of behaviour, words, gestures or acts that involve discrimination based on race, colour, sex, gender or gender reassignment, physical appearance, pregnancy, sexual orientation, marital status, age, religion, political convictions, language, ethnic or national origin, social condition or disability or the use of any means to palliate a disability. Appendix A – Definition of harassment situation - contains an interpretative guide identifying the constituent elements of the notion of harassment. Appendix B – Recognising psychological or sexual harassment - contains information on the concept of harassment and its application in workplaces.
Sexual harassment	Psychological harassment includes "sexual harassment", i.e. when the conduct mentioned above is of a sexual nature. In addition, sexual harassment is defined by the United Nations as "any unwelcome sexual advance, request for a sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other conduct of a sexual nature that might reasonably be expected to cause offence or humiliation to others, where such conduct interferes with work, becomes a condition of employment or creates an intimidating, hostile or offensive work environment".
Discrimination	Any distinction, exclusion or preference based on race, colour, sex, gender identity or expression, pregnancy, sexual orientation, marital status, age, religion, political convictions, language, ethnic or national origin, social condition, disability or the use of any means to palliate a disability, which has the effect of undermining or compromising the right to equal treatment.
Discriminatory harassment	Refers to conduct – such as repeated and unwanted words, acts or gestures of a vexatious or contemptuous nature – that is likely to harm the dignity or the physical or psychological integrity of a person, or to create unfavourable working conditions or lead to dismissal, based on any of the grounds listed in the definition of discrimination. Discriminatory harassment may take the form of:

	• Words, acts or any other behaviours that are explicitly or implicitly linked to a ground of discrimination. • The repetition of such words, acts or behaviours, or the continuing harmful effects of a single serious act. • The vexatious or contemptuous nature of such conduct towards the individual and/or the group to which he or she belongs. • The imposition of unfavourable conditions such as a hostile climate, demotion, refusal of promotion or unjustified differential treatment.
Whistleblowing	Whistleblowing is a process whereby an individual brings to CECI's attention a concerning situation, inappropriate behaviour or a potentially problematic working environment, without necessarily declaring himself or herself a victim or making a formal accusation. The situation may be observed, experienced or reported. Except where a report is manifestly futile or frivolous, all reports and complaints are subject to an admissibility analysis to determine whether the situation appears to meet the definitions of harassment or discrimination. By default, this analysis is carried out or supported by a qualified external consultant who is independent of the organization.
Complaints	A complaint is a formal action taken by a person who feels he or she has been the victim of psychological or sexual harassment. It involves an explicit request for intervention by CECI, in accordance with established procedures. Except where a complaint is manifestly futile or frivolous, all complaints and reports are subject to an admissibility analysis. By default, this analysis is carried out or supported by a qualified external consultant who is independent of the organization.
Incivility	Behaviour which deviates from the norms of mutual respect established in the workplace and which is detrimental to the well-being of a member of the organization, to the working climate and to cooperation between colleagues. For example: rudeness, contempt, casualness, refusal to cooperate, etc.
Sexual violence	In addition to the definition provided in the <i>Protection against Sexual Exploitation and Sexual Abuse policy</i>, sexual violence is defined as any form of violence targeting sexuality, or any other misconduct manifested through unwanted gestures, practices, words, behaviours or attitudes with a sexual connotation, whether occurring once or repeatedly. Sexual violence includes violence related to sexual and gender diversity.

5. ROLES AND RESPONSIBILITIES

To ensure a safe workplace free from psychological and sexual harassment, all individuals involved with CECI plays share responsibility for the preventing, detecting and responding to inappropriate behaviour.

The following responsibilities define, but are not limited to, the commitments expected of everyone:

RESPONSIBILITIES SHARED BY ALL

- Adopt exemplary conduct to promote a workplace free from all forms of harassment.
- Actively promote the principles of prevention in their work, with partners and in all contexts where CECI is active.
- Report any high-risk situation or any violation of the policy against psychological and sexual harassment using one of the reporting mechanisms provided for in this policy.

MEMBERS OF THE BOARD OF DIRECTORS

- Dedicate the required human and financial resources to ensure that the organization meets its commitments.
- Undertake to review the Policy Against Psychological and Sexual Harassment every five (5) years or as required by the law governing the matter and/or the context.
- Ensure exemplary ethical governance in the prevention of sexual exploitation and abuse.

CECI'S EXECUTIVE DIRECTOR (hereinafter referred to as the General Management)

- Stay informed of any complaint or report that is admissible or poses a risk for CECI, and of the measures taken to deal with it.
- Receive relevant information from investigative reports in order to manage the repercussions on the team and ensure continuity of operations.
- Be consulted on the measures to be considered, in accordance with Article 10.2, when the situation so requires.
- Refer the matter to the Ethics, Governance and Human Resources Committee, if necessary.

THE EXECUTIVE COMMITTEE

- Promote an organisational culture of respect and inclusion, based on prevention, accountability and transparency regarding psychological and sexual harassment.
- Ensure that the policy is disseminated to all CECI stakeholders.
- Protect complainants and offer them appropriate support measures.
- Support managers in the prevention and management of complaints or reports.
- Ensure exemplary ethical governance in the prevention of psychological and sexual harassment.

EMPLOYEES AND VOLUNTEERS (including interns and services providers)

- Respect colleagues and all other people with whom they interact in the course of their work.
- Participate in organizational activities (training, awareness-raising, communities of practice) established to prevent psychological and sexual harassment.
- Report any situation of psychological or sexual harassment that they witness or that is reported to them.
- Ensure the confidentiality of all information relating to a complaint or report.
- Collaborate in investigations, when required.

THE HUMAN RESOURCES DEPARTMENT

- Provide support and advice to managers in their interventions, in the corrective measures to be taken, and in disciplinary matters.
- Determine the nature of the action to be taken (mediation, investigation or other as required) following a complaint or report.
- Ensure the ongoing training of stakeholders.
- Manage and promote the Employee Assistance Program.
- Consult specialized resources for support, as required.
- Administer and enforce the policy in a consistent and confidential manner.
- Ensure the protection of those affected by a situation of harassment as well as those who have collaborated in managing a complaint or report.
- Receive and document complaints or reports submitted in person or by e-mail.
- Retain confidential documents for the period required under the applicable standards in each region.
- Coordinate with employees and ensure follow-up on the process for signing the policy's Acknowledgement Certificate.
- Disclose the incident, complete and transmit the required documents to donors, in accordance with their specific requirements,
- Review the policy in line with the governance in place.

COUNTRY MANAGEMENT AND REPRESENTATIVES

- Communicate, raise awareness and have the policy's Acknowledgement Certificate signed by all staff, volunteers and interns.
- Share and inform partners of CECI's Policy Against Psychological and Sexual Harassment.
- Receive and document complaints or reports received in person or by e-mail.
 - When applicable, promptly communicate with the Human Resources Department to determine the nature of the required intervention (use of an expert consultant, possibility of mediation, investigation, etc.), to agree on the steps for managing the complaint or report, and to obtain the necessary support for implementing the appropriate corrective and disciplinary measures.
- Designate a person to intervene locally as a mediator or investigator only when circumstances permit and with the explicit consent of both parties concerned.
- Coordinate the implementation of consultation activities (training, awareness-raising).

- Ensure the confidentiality of all information relating to a report.

ALL CECI TEAM MANAGERS

- Remain vigilant and attentive, in order to identify and act upon risk factors.
- React promptly to any situation of which they are aware and report it immediately in accordance with internal procedures.
- Identify, in collaboration with the Human Resources Department, the corrective and/or disciplinary measures to be applied.
 - Where applicable, promptly communicate with the Human Resources Department to obtain support in applying the corrective measures to be taken and in disciplinary matters, and determine the nature of the intervention to be carried out (mediation or investigation) following the report or complaint.
- Ensure the confidentiality of any and all information related to a complaint or report.

6. GUIDING PRINCIPLES

- All complaints and reports should be handled with diligence and discretion.
- Information relating to the handling of a complaint or report is confidential and used only to determine what corrective measures, if any, need to be taken.
- Persons who, in good faith, make use of the mechanisms made available to them will not be reproached if the complaint or report is ultimately deemed to be unfounded. Conversely, a complaint or report deemed to be unfounded and made in bad faith may be considered serious misconduct and may result in disciplinary measures.
- Cultural differences in interpretation must not hinder the proper handling of a complaint or report, and the approach must remain centered on the complainant or the reporting person.
- CECI will take all the necessary steps to:
 - Protect and support complainants;
 - Protect informants;
 - Maintain the confidentiality of the process.
- Prevention of reprisals. CECI maintains high standards of reference checks for its staff and volunteers and ensures that they adhere to the organization's values. Anyone involved in handling a report or complaint must:
 - Act impartially;
 - Act promptly;
 - Respect confidentiality, and;
 - Document the process.
- The timeframes for managing complaints and reports must be reasonable and clearly communicated to the parties concerned.
- CECI is committed to monitoring the effectiveness of the measures implemented and to adjust them as needed.

7. PREVENTION PROGRAM

CECI's prevention program is made up by a series of planned and structured activities.

TRAINING AND AWARENESS

- Mandatory training for all new staff within six (6) months of being hired;
- Specific training for those responsible for handling complaints and reports (unless this responsibility is handled externally);
- Refresher training every three (3) years for all staff.

RISK IDENTIFICATION AND CONTROL

- Implementation of preventative measures based on risk analysis;
- Review of measures following reported incidents.

COMMUNICATION AND AWARENESS

- Dissemination and annual signature of the policy's Acknowledgement Certificate by employees and volunteers. Board members will be required to sign the Acknowledgement Certificate every two years;
- Accommodation and awareness-raising adapted to different cultural contexts;
- Awareness-raising materials.

8. MECHANISMS FOR MANAGING COMPLAINTS AND REPORTS

Before lodging a complaint or report, and only if the person concerned feels able and safe to do so, certain steps can be taken on a voluntary basis:

- Expressing discomfort directly to the person concerned may, in some cases, help to defuse the situation. However, this approach must be considered with great caution. Where there is a power imbalance, significant discomfort or a lack of tools for dialogue, it is entirely legitimate not to engage in such a discussion alone. If the person nevertheless chooses this option, it is strongly recommended that they be accompanied by a trusted person or a designated resource, both for their own safety and as a witness.
- Record the facts, noting dates, locations, circumstances and any relevant information relating to the incidents.
- Document the steps taken, including any attempts at dialogue or the names of people consulted.

These actions are not compulsory, but may prove useful, in particular to support a complaint or a subsequent report. CECI provides a number of confidential and secure mechanisms for reporting inappropriate behaviour or psychological or sexual harassment.

COMPLAINING AND REPORTING

CECI provides its staff, volunteers and all those associated with its projects or programs with several secure, confidential and accessible mechanisms for reporting psychological or sexual harassment. These mechanisms are designed to facilitate speaking out, ensure a prompt response, and protect all parties concerned.

The complainant or informant must provide sufficient information to enable the complaint or report to be dealt with properly. This information includes:

- The identity of those concerned;
- A clear description of the context and the alleged facts;
- Any other relevant information, especially the names of witnesses, locations, dates and details, if applicable.

A form is available in [Appendix C](#) – Filing a complaint or harassment report - to facilitate the transmission of this information. In the case of an allegation made orally, the person receiving the allegation may also use this form to record the information communicated.

8.1 TIME LIMIT FOR FILING A COMPLAINT OR REPORT

PSYCHOLOGICAL HARASSMENT

A complaint or report of psychological harassment must be lodged as soon as possible - ideally as soon as the facts are known - and at the latest within the period prescribed by local legislation.

In the absence of a specific legal provision in the country of programming, CECI will apply a time limit of two (2) years following the last occurrence of the alleged harassment, except in cases of force majeure.

SEXUAL HARASSMENT

The time limits for filing a complaint or reporting sexual harassment vary according to the applicable legal framework.

For example, in Quebec, a complaint in the workplace may be filed with the CNESST or the Commission des droits de la personne et des droits de la jeunesse. The time limit to file a sexual or psychological harassment complaint is usually two (2) years following the last manifestation of harassment. Internationally, time limits vary considerably from one country to another. Each country has its own legislation on sexual harassment, with specific definitions, procedures and time limits.

It is also essential to distinguish between the seriousness of the acts. When sexual harassment involves acts of abuse, assault or any other violent act of a sexual nature, the situation may fall within the scope of the *Prevention of Sexual Exploitation and Sexual Abuse (PPEAS)* policy and criminal law.

Any person making a complaint may, at any time and within the time limits prescribed by law, lodge a complaint with a court. CECI points out that physical or sexual assault is an offence under the

Criminal Code and that a complaint to the appropriate authorities may be appropriate.

8.2 CHANNELS FOR SUBMITTING COMPLAINTS OR REPORTS

➤ Written complaints or reports submitted to the Human Resources Department

Complaints or reports may be sent directly to the Human Resources Department at directionRH@ceci.ca. The e-mail must include the information specified in Article 9.1.

➤ Complaints or reports submitted to a person in a position of responsibility

Complaints or reports may also be made to:

- A manager;
- A regional or country director or representative;
- The person designated as responsible for applying the policy in the country.

These individuals are responsible for gathering the relevant information and forwarding it promptly to the Human Resources Department (directionRH@ceci.ca).

➤ Complaints or reports submitted to an independent external resource

Complaints or reports can be submitted anonymously and confidentially to plainte@koesia.ca (in French, English or Spanish).

This address is managed by an external professional resource, independent of CECI. The information shared remains strictly confidential and will only be communicated to a trusted CECI resource with the explicit consent of the complainant.

8.3 EXCEPTIONS: COMPLAINTS OR REPORTS CONCERNING A MEMBER OF THE BOARD OF DIRECTORS, EXECUTIVE DIRECTOR OR HUMAN RESOURCES DEPARTMENT

Complaints and reports will be handled in accordance with the procedure established in this policy. The individuals responsible for handling the report or complaint will do so in the following manner:

➤ Complaints or reports concerning a member of the Board of Directors

If a complaint or report concerns a member of the Board of Directors, in addition to calling on the independent external resource, the Executive Director and the Human Resources Department will call upon the Chair of the Board of Directors and the Chair of the Ethics, Governance and Human Resources Committee to help determine admissibility and, where appropriate, the approach to the investigation and the resulting measures.

If the complaint or report concerns the Chair of the Board of Directors or the Chair of the Ethics, Governance and Human Resources Committee, the person concerned will be replaced by another member of the EGRH Committee to help manage the case.

➤ **Complaints or reports concerning the Executive Director**

If a complaint or report concerns CECI's Executive Director, in addition to calling on the independent external resource, the Human Resources Department will call on the Chair of the Board of Directors and the Chair of the Board of Directors' Ethics, Governance and Human Resources Committee to help determine admissibility and, where applicable, the approach to the investigation and the resulting measures.

➤ **Complaints or reports concerning the Human Resources management**

If a complaint or report concerns the Human Resources department, in addition to calling on the independent external resource, the Executive Director will call upon another colleague from the Executive Committee to help determine admissibility and, where appropriate, the approach to the investigation and any resulting measures.

9. ADMISSIBILITY ANALYSIS

9.1 RECEIVING A COMPLAINT REPORTS

Any complaint or report addressed to a manager, senior management, or local representative must be communicated promptly to CECI's Human Resources Department in order to ensure centralized and appropriate follow-up in accordance with internal procedures.

When a complaint or report is received, the Human Resources Department, or any person designated to manage it, will inform the complainant in writing that it has been received. It will then contact the complainant in order to:

- Explain the process for handling the complaint or report;
- Explain their rights and responsibilities;
- Understand the nature of the situation reported.

As soon as a complaint or report is received, the manager, the local director or representative, and the Human Resources Department must respect the obligation of confidentiality.

9.2 PROTECTION MEASURES

As soon as a complaint or report is filed, CECI may implement, without delay, the measures deemed necessary or relevant in order to:

- Preserve a safe and respectful work environment;

- Protect and reassure the persons concerned;
- Limit the impact on teams;
- Ensure continuity of operations in a healthy professional climate.

9.3 ASSESSING THE ADMISSIBILITY OF A COMPLAINT OR REPORT

To ensure rigorous neutrality, all complaints and reports are systematically examined with the support of a qualified external consultant, independent of the organization. The extent of the consultant's involvement is adapted to the particularities of each report. Cases deemed admissible are then discussed in accordance with the provisions of Article 8 of this policy.

A complaint or report is deemed admissible if the following four (4) elements are demonstrated:

1. The information provided is enough to enable the complaint or report to be processed;
 - Failing this, the complainant may be asked for clarifications or additional information;
2. The allegations are not frivolous or made in bad faith;
3. The alleged facts, if proven to be true after conducting an investigation, could constitute harassment within the meaning of this policy (see Appendix A);
4. In the case of a complaint or report for psychological harassment, the complaint or report was filed within the time limit established in Section 8.1.

Inadmissible complaint or report

If the complaint or report is deemed inadmissible, the Human Resources Department shall:

- Inform the complainant of the decision and the reasons why the complaint or report was deemed inadmissible;
- Provide the managers of the parties involved with the required information necessary to manage the situation and preserve well-being in the workplace;
- Even if the complaint or report is deemed inadmissible, the HR department may identify problematic behaviour by one or both parties that adversely affects working relations. The goal is to promote behavioural improvement so as to maintain a healthy and respectful work environment.

In such cases, human resources management may:

- Suggest alternative ways for the parties to resolve the situation;
- Involve the involved parties' managers, if necessary.

Admissible complaint or report

If the complaint or report is deemed admissible, the Human Resources department shall:

- Inform the parties in writing;
- Forward the alleged facts to the person concerned so that they can adequately prepare for a possible meeting and, if they wish, respond in writing;

- Communicate to the parties' managers only the information necessary to address the repercussions on the team and ensure the smooth running of operations;
- Communicate with each party separately to present the available options for handling the complaint, namely:
 - Alternative resolution methods, or
 - The investigation process.

10. PROCESSING ADMISSIBLE COMPLAINTS AND REPORTS

When a complaint or report is deemed admissible, the Human Resources Department, in collaboration with the Executive Director, assesses the nature and seriousness of the alleged facts, in consultation with the parties concerned, in order to determine the most appropriate method of handling the situation. If necessary, an external consultant may support the process.

With CECI's consent, the parties may opt for an alternative dispute resolution process, such as mediation or facilitation, aimed at resolving the situation in a collaborative, confidential and respectful manner.

The consent of both parties and of CECI is required for an alternative dispute resolution process to be implemented.

In the absence of consent, complaints and reports are handled through the investigation process. The investigation process consists of mandating a neutral and qualified person to examine the facts, hear the parties and draw conclusions.

10.1 ALTERNATIVE RESOLUTION

Alternative methods of resolving a complaint or report include facilitation and mediation. The goal of alternative resolution is to:

- Resolve problems or disputes in a manner that is satisfactory and acceptable to both parties;
- Identify solutions tailored to the parties' needs;
- Restore a healthy, respectful and harmonious working environment.

The implementation of an alternative resolution method is subject to the following conditions:

- The consent of both parties and of CECI;
- The active participation of both parties throughout the process;
- The possibility for either party to withdraw from the process at any time.

The Human Resources department may entrust a facilitation or mediation mandate to an internal or external professional resource.

Unless otherwise agreed to in writing by both parties and by CECI, the process is confidential.

If no agreement is reached or if one of the parties withdraws from the process, the complaint or report is then handled by the investigation process.

10.2 FORMAL INVESTIGATION

If the parties and CECI do not agree to an alternative method of resolving the complaint or report, the complaint or report will be investigated within a reasonable period of time.

The Human Resources Department:

- Notifies the parties in writing of the launch of the investigation;
- Informs them of the details of the process, as well as their rights and responsibilities;
- May mandate a neutral, impartial and competent professional, either within CECI or as an external resource, to conduct the investigation.

The objectives of the investigation are to:

- Determine the validity of the alleged facts;
- Guarantee the right of each party to be heard and to present their version of the facts;
- Offer each party fair conditions to respond to the allegations or present their point of view;
- Produce a written and documented report and propose conclusions.

The investigation may be conducted by:

- A trained internal professional, or
- An independent, external resource in sensitive or complex cases.

The investigation is rigorously documented and stored in a secure location, with full traceability of all steps taken throughout the process.

- Concerned parties are informed in writing of the launch of the investigation;
- Each party is given the opportunity to present their version of the facts in a fair manner;
- Witnesses deemed relevant are interviewed as part of the investigation;
- The investigation is conducted rigorously, diligently and impartially;
- The confidentiality of the entire process is strictly respected.

10.3 TEMPORARY SUSPENSION OF THE INVESTIGATION

If, during the investigation, the parties and CECI agree to an alternative resolution method:

- The investigation is temporarily suspended while the complaint or report is processed in accordance with Article 10.1;
- If an agreement is reached in accordance with Article 10.1, the investigation is cancelled;

- If no agreement is reached, the investigation is reinstated and the parties are informed.

10.4 INVESTIGATION REPORT

At the end of the investigative process, the person responsible of the investigation shall complete a final and detailed report, setting out the facts, analyses and conclusions.

This report must be sent to Human Resources. This document forms the basis on which CECI's HR department assesses the situation and communicates its conclusions to senior management.

Following the investigation, the possible conclusions are:

Well-founded complaint or report

If the complaint or report is deemed to be well-founded, Human Resources, department, in collaboration with senior management and the other departments concerned, will determine the appropriate disciplinary measures, which may include:

- Progressive disciplinary measures, up to and including immediate dismissal;
- Administrative measures (change of position, increased supervision, etc.);
- Training or awareness-raising activities;
- Support measures for the complainant;
- Documentation of the complaint or report in the HR file of the person found responsible.

Complaints or reports that are unfounded and made in good faith

When a complaint or report is deemed unfounded but made in good faith:

- No action is taken against the complainant;
- Recommendations may be made to improve the situation;
- Support measures may be offered to the parties.

Complaints or reports made in bad faith

A complaint or report made in bad faith or with malicious intent:

- Is considered serious misconduct;
- May result in disciplinary measures being taken against the complainant;
- Documentation of the incident in the in the complainant's HR file.

In compliance with privacy legislation, managers and senior management receive information on a need-to-know basis in order to manage the impact on teams and ensure continuity of operations.

11. DOCUMENT RETENTION

All documents related to an investigation are kept in a separate, confidential file with limited access. No document relating to a harassment complaint or report is placed in the personal file of either party, with the exception of administrative and disciplinary letters, which are placed in the HR file of the person against whom action is being taken.

12. MONITORING AND EVALUATION

The Human Resources Department shall:

- Maintain a confidential register of all complaints and reports and their processing;
- Produce an anonymized, annual report to the Executive Committee that includes:
- The number and nature of all complaints and reports received;
 - The types of actions taken;
 - The corrective measures taken;
 - Recommendations for improvement.

The Executive Director shall:

- Evaluate the effectiveness of the policy annually;
- Ensure that the policy is reviewed every five (5) years, or more frequently, if necessary;
- Ensure that the recommended improvements to the policy are implemented;
- Present the results of the anonymized report to the Ethics, Governance and Human Resources Committee and make recommendations where necessary.

This policy meets the contractual requirements issued by Global Affairs Canada and complies with Cooperation Canada's Leadership Commitment to Prevent and Combat Sexual Misconduct.

13. REQUEST FOR INFORMATION

Any questions regarding this policy, its interpretation or its application may be addressed to the Human Resources Department at directionRH@ceci.ca.

ACKNOWLEDGEMENT

I, the undersigned, declare that:

- I have read and understood this Policy Against Psychological and Sexual Harassment;
- I understand my role and responsibilities in preventing and reporting situations of psychological and sexual harassment;
- I undertake to
 - Behave in a manner consistent with the values of the organization;
 - Adhere to the standards of behaviour described in this policy;
 - Report any situation of psychological or sexual harassment that I witness;
 - Maintain the confidentiality of all information relating to a complaint or report;
 - Cooperate with any investigation, if required.

I understand that a failure to comply with the Policy Against Psychological and Sexual Harassment or a breach of one or more of its provisions may result in disciplinary action up to and including dismissal, termination of my contract or dismissal.

Name

Signature

Position

Date

APPENDIX A: DEFINITION OF HARASSMENT

For a situation to be considered as harassment, whether psychological or sexual, all five (5) of the following elements must be present at the same time. These elements are assessed objectively, according to the criteria of a reasonable person placed in the same circumstances, and not according to the person's subjective perception.

1. VEXATIOUS CONDUCT

Vexatious conduct takes the form of disrespectful behaviour, words, actions or gestures that are likely to cause pain, hurt, humiliate, insult or upset the person concerned. It can take different forms, such as

- Denigrating or humiliating comments;
- Threatening or intimidating gestures;
- Exclusionary or isolating behaviour;
- Unjustified or repeated criticism.

2. REPETITION OR SERIOUSNESS OF BEHAVIOUR

In principle, behaviour must be repeated over time to constitute harassment. However, the seriousness of certain actions may mean that a single event is sufficient to be classified as harassment.

3. HOSTILE OR UNWANTED BEHAVIOUR

Hostile behaviour is carried out with the intention of causing harm. In this case, it is not necessary for the person to have expressed his or her disagreement for the behaviour to be considered unwanted.

Unwanted behaviour, even without malicious intent, may be considered harassment if the person concerned has clearly expressed their discomfort or refusal, and the behaviour persists despite this.

4. DAMAGE TO DIGNITY OR INTEGRITY

Harassment affects a person's dignity or psychological or physical integrity. The consequences may include:

- Loss of self-esteem or confidence;
- Emotional or physical problems (stress, anxiety, fatigue, insomnia, etc.);
- A deterioration in mental or physical health.

Symptoms of harassment frequently observed include: crying, depression, irritability, isolation, memory problems, loss of appetite, backache, dizziness, tremors, etc.

5. IMPACT ON THE WORKPLACE

Vexatious behaviours also affect the working environment, which becomes unhealthy for the person concerned. They may feel constantly uneasy, lose motivation or want to flee their work environment.

Recommendation : *If you have any doubts or difficulty determining whether the situation you are experiencing could constitute harassment, do not hesitate to consult Human Resources, your manager or an independent consultant. Together, we can analyse the situation with you.*

APPENDIX B: RECOGNIZING PSYCHOLOGICAL OR SEXUAL HARASSMENT

The purpose of this Appendix is to clarify the types of behaviour that may be associated with harassment in the workplace, while taking into account the cultural and legal realities specific to the various countries in which CECI operates. This is not an exhaustive list but rather a set of guidelines to help identify concerning situations.

BEHAVIOUR THAT MAY BE LINKED TO PSYCHOLOGICAL HARASSMENT

Psychological harassment refers to behaviour that may be serious and isolated or repeated, and that has the effect of harming a person's integrity, dignity or psychological well-being. Such behaviour may create a hostile, humiliating or intimidating work environment.

Examples:

- Social or professional exclusion, such as systematically ignoring a person in exchanges, isolating them from important communications or team activities.
- Constant devaluation, through unjustified criticism, contemptuous comments or humiliating remarks about a colleague's skills, ideas or performance.
- Excessive pressure or abuse of authority, such as the imposition of unrealistic tasks, frequent and unjustified changes of objectives, or intrusive monitoring of work.
- Verbal or behavioural violence, including insults, name-calling, defamatory remarks or offensive gestures, whether isolated and separate, or serious and repeated.
- Direct or indirect bullying, such as threats related to continued employment, performance evaluation or professional reputation.
- Cyberbullying, by sending hostile or humiliating messages via digital tools.
- Discriminatory comments, in particular those of a racist or sexist nature or based on origin, religion, sexual orientation or any other characteristic protected by local legislation.
- Retaliation or punitive behaviour in response to a complaint, report or legitimate point of view.
- Misuse of a hierarchical position to impose decisions or behaviour that exceed the limits of a respectful professional framework.

BEHAVIOUR THAT MAY BE LINKED TO SEXUAL HARASSMENT

Sexual harassment can take different forms - verbal, non-verbal or physical - and is characterized by unwanted behaviour of a sexual connotation that undermines a person's dignity or creates an intimidating, offensive or humiliating work environment.

Examples:

- Unwelcome or humiliating comments relating to a person's physical appearance, body, identity or sexual orientation.
- Jokes, comments or insinuations of a sexual nature, expressed in person or via e-mail, messages, images or other technological means.

- Repeated sending of inappropriate content, such as suggestive images or messages with sexual connotations.
- Unsolicited gestures or physical contact, such as brushing, touching or attempted kissing.
- Insistent advances, even after an explicit refusal, or repeated solicitations of a sexual nature.
- Implicit or explicit promises of professional rewards in exchange for sexual favours.
- Use of sexually suggestive language in a professional context, creating discomfort or undue pressure.

BEHAVIOUR OR SITUATIONS THAT DO NOT GENERALLY CONSTITUTE PSYCHOLOGICAL OR SEXUAL HARASSMENT

Certain behaviours, although unpleasant or a source of tension, do not constitute harassment if they are occasional, not malicious or related to the legitimate exercise of professional responsibilities.

Examples

- Reorganising tasks or responsibilities to meet operational needs or the realities of programming countries. Applying disciplinary or administrative measures, including termination of employment, where justified and in accordance with internal policies.
- Management disagreements or occasional conflicts between colleagues, even if they generate tension or discomfort.
- Dealing with interpersonal conflict between colleagues or difficult interpersonal relationships.
- Exercising supervisory or managerial functions in a professional manner, without abuse or discrimination.
- Dealing with major professional constraints or periods of high pressure linked to the work or context of action.
- Giving negative or constructive feedback as part of a performance review.
- Implementing organisational changes, such as restructuring or reassignment.
- Engaging in behaviour that is perceived as rude or uncivil, when it is not repeated or malicious.

APPENDIX C HARASSMENT COMPLAINT OR REPORT FORM

Information about the complainant	
First name and surname	
Job title	
Country	
E-mail	
Phone	

Information on the alleged perpetrator(s)	
First name and surname	
Job title	
Country	
Relationship to the complainant	
<i>To be completed if necessary. If there are more than two complainants, please add a section or indicate the information overleaf.</i>	
First name and surname	
Job title	
Country	
Relationship to the complainant	

Information on the facts of the complaint or report
Description of the general context. Presentation of the facts (<i>examples: places, times, dates, behaviour, alleged acts or gestures, witnesses, evidence, e-mails, text messages, images, etc.</i>).

Resolution sought
In your own words, what desired resolution to this complaint or report do you seek (alternative treatment, mediation, investigation, support in legal proceedings, etc.).

Signature of complainant and date	
Signature	
Date	

Where possible, the form should be sent to directionRH@ceci.ca , to a person in a position of responsibility, or submitted confidentially and anonymously to plainte@koesia.ca.

Use of this form, although not compulsory, is recommended to ensure that all essential information is transmitted. All complaints or reports, whether submitted using this form or not, will nevertheless be subject to an admissibility analysis.

By default, this analysis is carried out or supported by a qualified external consultant who is independent of the organization.