

ANTI-HARASSMENT POLICY

Parcel Partner strives to create and maintain a work environment in which people are treated with dignity, decency, and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Parcel Partner will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, Parcel Partner will seek to prevent, correct, and discipline behaviour that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment, or retaliation, including the failure to immediately report such misconduct to human resources (HR), are in violation of this policy and subject to discipline.

Prohibited Conduct Under This Policy

Parcel Partner, in compliance with all applicable anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:
Discrimination

It is a violation of Parcel Partner's policy to discriminate in the provision of employment opportunities, benefits, or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, colour, national origin, age, religion, disability status, sex, sexual orientation, gender identity or expression, genetic information or marital status. Discrimination in violation of this policy will be subject to disciplinary measures up to and including termination.

Harassment

Parcel Partner prohibits harassment of any kind, including sexual harassment and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate, or coerce an employee, co-worker, or any person working for or on behalf of Parcel Partner.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's national origin, race, colour, religion, age, sex, sexual orientation, pregnancy, appearance, disability, gender identity or expression, marital status, or other protected status, including epithets, slurs, and negative stereotyping.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion, or disrespect toward an individual or group because of national origin, race, colour, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital status, or other protected status.

Sexual harassment

Sexual harassment is prohibited under Parcel Partner's anti-harassment policy. Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal, and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories, and jokes
- Commenting on a person's clothes in a sexual nature
- Sexual advances
- Nick name & Pet Names of a sexual nature
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Parcel Partner recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Parcel Partner recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of Parcel Partner, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within Parcel Partner premises or outside, including at social events, business trips, training sessions or conferences sponsored by Parcel Partner.

Retaliation

No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Lodging a bona fide complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of employment.

Confidentiality

All complaints and investigations are treated confidentially to the extent possible and information is disclosed strictly on a need-to-know basis. All information pertaining to a complaint or investigation under this policy will be maintained in the employee files.

Complaint procedure

Parcel Partner has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

Anyone who is subject to harassment, discrimination or retaliation should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Parcel Partner recognises that harassment, discrimination or retaliation may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints. This person could be another supervisor, a member of the human resources department, etc.

When a designated person receives a complaint, he/she will:

- Immediately record the dates, times and facts of the incident(s)
- Ascertain the views of the victim as to what outcome he/she wants ensure that the victim understands the company's procedures for dealing with the complaint
- Discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint.
- If he/she is not satisfied with the outcome keep a confidential record of all discussions respect the choice of the victim ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework

Parcel Partner recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. Parcel Partner understands the need to support victims in making complaints.

Informal complaints mechanism

If the victim wishes to deal with the matter informally, the designated person will:

- Give an opportunity to the alleged harasser to respond to the complaint.
- Ensure that the alleged harasser understands the complaints mechanism facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter.

- Ensure that a confidential record is kept of what happens.
- Follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped.
- Ensure that the above is done speedily and within 7 days of the complaint being made.

Formal complaints mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior manager to instigate a formal investigation. The senior manager may deal with the matter him/herself.

The person carrying out the investigation will:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 7 days of the complaint being made

Outside complaints mechanisms

A person who has been subject to harassment or discrimination can also make a complaint outside of the company. They can do so through i.e. employment tribunal.

Sanctions and disciplinary measures

Anyone who has been found to have harassed or discriminated another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

Implementation of this policy

Parcel Partner will ensure that this policy is widely disseminated to all relevant persons. All new employees must be trained on the content of this policy as part of their induction into the company.

It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

Monitoring and evaluation

Supervisors, managers and those responsible for dealing with cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

I HAVE READ, UNDERSTOOD AND WILL ADHERE TO THE ABOVE POLICY AND I'M FULLY AWARE OF THE SEVERITY IF I DO NOT ADHERE.

Name: _____ Sign: _____

Date: _____