

## Policy on preventing harassment at work<sup>1</sup>

### Article 1: General

- a) Harassment is defined as all behaviour and actions which, for employees and contractors are a violation of (physical) integrity and which are experienced as offensive or disparaging. Examples of harassment include sexual intimidation, bullying, discrimination, aggression, and violence (Articles 2 to 5 inclusive).
- b) CILC [Center for International Legal Cooperation] does not tolerate any form of harassment. Those who are guilty of harassment can expect sanctions. Depending on the gravity of the complaint, the following sanctions may be applied: official warning (in writing), suspension, relocation, dismissal. In criminal behaviours, the victim can be advised to make a report to the police at any time.
- c) Any employee or contractor who is of the opinion that he is confronted with harassment in his work situation may go to the Designated Trusted Person.
- d) The regulation applies to employees and contractors who are employed by/are contracted/commissioned by CILC. The regulation also applies to temporary employees and interns.

### Article 2: Sexual intimidation

- a) CILC considers sexual intimidation unacceptable.
- b) Sexual intimidation is defined as: any form of verbal, non-verbal or physical behaviour with a sexual connotation that has the aim or consequence of violating the person's dignity when a threatening, hostile, insulting, disparaging or offensive situation is created.

### Article 3: Discrimination

- a) CILC considers discrimination unacceptable.
- b) Discrimination is defined as making direct or indirect distinction, except for the exceptions stated in the equal treatment legislation;
- c) Direct distinction is defined as: distinction between individuals on the grounds of religion, philosophy, political conviction, race or ethnicity, gender identity, nationality, sexual orientation, marital status, age, handicap, social class or chronic illness;
- d) Indirect distinction is defined as: distinction on the grounds of capacities or behaviours other than those specified previously, which result in direct distinction;
- e) Intentionally insulting expressions verbally or in writing or imagery about a group of people due to their religion, philosophy, political conviction, race or ethnicity, gender identity, nationality, sexual orientation, marital or parental status, age, handicap or chronic illness;
- f) Acting violently against persons or a group of persons due to their religion, philosophy, political conviction, race or ethnicity, gender identity, nationality, sexual orientation, marital status, age, handicap, or chronic illness.

### Article 4: Aggression and violence

- a) CILC considers aggression and violence unacceptable.
- b) Aggression and violence are defined as: cases where a person is harassed, threatened or attacked psychologically or physically.

---

<sup>1</sup> Wherever “he” / “him” is referred to, “she” or “it” / her is also the intended meaning.

## Article 5: Bullying

- a) CILC considers bullying unacceptable.
- b) Bullying is defined as: all forms of intimidating behaviour on a structural basis, from one or more persons directed at one person or group of persons. An important element regarding bullying is the repetition of the behaviour in time.

## Article 6: Policy

- a) CILC shall take targeted measures within the organisation and working environment, including in our international projects, to prevent harassment and to combat occurrences, if applicable.
- b) CILC is expected to arrange the organisation and working environment in such a manner that harassment is prevented.
- c) CILC must pursue a corresponding policy that prevents and combats harassment in the work organisation.

A corresponding policy contains the following components:

- i. the implementation of preventative policy;
  - ii. the appointment of a designated trusted person;
  - iii. development and implementation of a complaints procedure;  
The complaints procedure forms part of the Regulation regarding individual processing of objection, dispute and appeal.
- d) CILC fulfils the provision in paragraph 3a by informing all employees and contractors that harassment is not tolerated and will lead to sanctions for the person who is guilty of it. All employees and contractors will be informed via the usual information channels about the policy for preventing and combatting harassment at work.
  - e) If the employee or contractor has experienced a serious incident or multiple small incidents, he may approach the designated trusted person (see also Article 7).
  - f) CILC shall report on the situation regarding the policy with respect to harassment, the number of complaints and the nature of the complaints. The report shall be discussed in general terms with the CILC team. The annual report shall also include a complaints (sub-) chapter.

## Article 7: Designated trusted person

- a) CILC appoints an externally designated trusted person.
- b) In any event, the designated trusted person has the following tasks:
  - i. caring for the employee or contractor who is/are confronted with harassment in their work and providing advice and support;
  - ii. informing the employee or contractor about the different paths that are open in order to resolve the problem or to submit a complaint about the case;
  - iii. guiding the employee or contractor if they choose to have the case mediated or presented to others.
  - iv. possible referral of the employee or contractor to external experts in the relevant field;
  - v. recommendations (solicited or unsolicited) to the director, the board of directors, the supervisory committee or other persons within the organisation regarding prevention and suppression of harassment;
  - vi. ensuring information, visibility and contact details about own position regarding harassment, including to new employees in the first month of employment;
  - vii. recording reports and complaints and reporting these to the board and supervisory committee in an anonymised manner every year;

- viii. processing the reports and complaints received with due observance of confidentiality and informing third parties only with approval from the relevant the employee or contractor.