

## Anti-Harassment Policy

The Blue Gold Program endeavors to provide a congenial work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment.

Harassment is unwanted conduct that denigrates or affects the dignity of an individual and creates an intimidating, hostile or offensive work environment. It may be related to factors such as sex, race, color, religion, age, sexual orientation, citizenship status, ethnicity, national origin, and physical or mental disability. Harassment may include, but is not limited to:

1. Slurs, negative stereotyping, ridiculing or bullying someone
2. Spreading malicious rumors, making unsubstantiated complaints or suggestive comments about someone
3. Unfair treatment and degrading public tirades
4. Deliberate insults or threats, whether oral or written, including by email
5. Causing offence by unwelcome jokes or (eve) teasing and messages (by email, phone calls or social media)
6. Sexual harassment such as unwanted sexual advances or propositions and unwanted physical contact
7. Inappropriate treatment of junior staff/colleagues including during residential training
8. Discrimination on any grounds is also part of this policy.

Also the following will not be tolerated:

9. Active or passive encouragement of harassment by others and failure to report harassing conduct that a supervisor witnesses (or is brought to his/her attention); and
10. Harassment by vendors, workers service technicians or other third parties doing business commissioned by Blue Gold, if reported to a supervisor or manager and nothing is done to stop it.

Any acts of harassment or discrimination will be viewed as gross misconduct and any employee found to have been engaged in harassment will be subject to immediate responsive action, up to and including termination of employment.

### Measures in case of harassment or discrimination

A first option for staff members facing harassment is to inform the harasser that his/her conduct or advances are unwelcome and asking him/her to desist.

If harassment continues, or the staff member does not feel comfortable speaking against his/her harasser, and/or the harassment is of a serious nature, the staff member facing harassment must report such incidents to one of the Blue Gold anti-harassment contact persons (see list below), regardless of the accused's identity or position. If for any reason, the staff member feels the report is not being properly and fully addressed, he/she must also report the charge to the Blue Gold Team Leader. The Blue Gold Team Leader will report the charge to the partner company that employs the complainant. If the staff member facing harassment does not wish to report the incident through official channels, he or she can submit a written account through the complaint box available in all Blue Gold offices. Any written submissions will be submitted by the Gender Coordinator and shared directly with the Team Leader for a decision about further action.

The following incidences of harassments and discrimination must be reported:

- Incidents by other Blue Gold staff
- Incidents by third parties to Blue Gold staff
- Harassment of Blue Gold beneficiaries by either Blue Gold staff and/or third parties.

Confidentiality must be maintained by avoiding discussions of allegations with people not directly involved in addressing the issue.

### Investigating and resolving a complaint

The Contact persons will investigate any complaint (whether verbal or in writing) in accordance with Blue Gold's anti-harassment policy.



If there is insufficient evidence to substantiate the complaint, there will be no further action, but the staff member will be encouraged to report any future incidences.

If there is evidence that the charge of harassment is false or intentional, the complainant will face the consequences, which may include disciplinary measures.

If the allegations are substantiated, disciplinary measures will be taken. Support is available for the complainant to recover from the consequences of the harassment.

#### **Disciplinary measures**

Depending on the seriousness of the incident the disciplinary measures may include oral reprimand, written reprimand, suspension without pay, re-assignment, demotion and/or dismissal. The complaint and the results of the investigation are recorded in the personal files of the complainant and the alleged harasser and forwarded to the HR department of the partner company/companies that employ the concerned staff members.

In case of harassment by third parties to Blue Gold staff members or beneficiaries, disciplinary measures may not be possible, but mitigation measures will be devised to stop or reduce the harassment.

***No action will be taken against any member of Blue Gold who brings infringements of this policy to the notice of the anti-harassment team.***

#### **Blue Gold anti-harassment contact persons and phone numbers**

**Dhaka Office**

**Khulna Office**

**Patuakhali Office**

**Satkhira Office**

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