

SEXUAL HARASSMENT POLICY STATEMENT

It is the policy of Insight Management Consultants Limited (IMCL) that all employees are responsible for ensuring that the workplace is free from sexual harassment. Because of <u>IMCL</u> strong disapproval of offensive or inappropriate sexual behavior at work, all employees must avoid any action or conduct which could be viewed as sexual harassment.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexually harassing nature, when:-

- 1. Submission to the harassment is made either explicitly or implicitly a term or condition of employment.
- 2. Submission to or rejection of the harassment is used as the basis for employment decisions affecting the individual.
- 3. The harassment has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Any employee who has a complaint of sexual harassment at work by anyone, including supervisors, coworkers or visitors, should first clearly inform the harasser that his/her Behavior is offensive or unwelcome and request that the behavior stop. If the behavior continues, the employee must immediately bring the matter to the attention of his/her supervisor. If the immediate supervisor is involved in the harassing activity, the violation should be reported to that supervisor's immediate manager or the HR Officer.

If a Supervisor or HR Officer knows of an incident of sexual harassment, they shall take appropriate remedial action immediately. If the alleged harassment involves any types of threats of physical harm to the victim, the alleged harasser may be suspended with pay. During such suspension, an investigation will be conducted by IMCL. If the investigation supports charges of sexual harassment, disciplinary action against the alleged harasser will take place and may include termination. If the investigation reveals that the charges were brought falsely and with malicious intent, the charging party may be subject to disciplinary action. If an employee is dissatisfied with management's response to his/her complaint, he/she may contact the Relevant Government Authorities.

David Malago MANAGING DIRECTOR June 2, 2015.