

52A Campbell Street (4th Floor) Lagos, Nigeria

Tel: +2348100000127 +2348155555275 +447448360744 (UK)

Email: ptolani@cesel.com.ng
Web: www.cesel.com.ng

POLICY AGAINST HARASSMENT AND VICTIMIZATION

Introduction

CESEL is committed to providing a work environment that is free from harassment, discrimination, and victimization. We believe that all employees have the right to work in an environment where they are treated with dignity and respect. As such, this policy outlines our stance on harassment and victimization and provides guidelines for addressing such behavior in the workplace.

Scope

This policy applies to all employees, including full-time, part-time, temporary, and contract workers, as well as interns, volunteers, and any other individuals engaged in work-related activities on behalf of CESEL. It covers all forms of harassment and victimization, including but not limited to sexual harassment, discrimination, bullying, and retaliation.

Definitions

Harassment: Harassment refers to any unwelcome conduct, whether verbal, physical, or visual, that creates an intimidating, hostile, or offensive work environment or interferes with an individual's work performance. This includes but is not limited to derogatory remarks, jokes, slurs, threats, gestures, or physical contact.

Victimization: Victimization is any adverse treatment or retaliation against an individual who has made a complaint, provided information, or participated in an investigation related to harassment or discrimination.

Sexual Harassment: Sexual harassment encompasses unwelcome sexual advances, requests for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature that creates a hostile or offensive work environment.

Discrimination: Discrimination involves treating an individual unfavorably due to their race, color, ethnicity, nationality, religion, gender, sexual orientation, age, disability, marital status, or any other characteristic protected by Nigerian law.

Bullying: Bullying refers to repeated, unreasonable actions directed towards an individual or group that create a risk to health and safety and undermine their dignity. This can include verbal abuse, offensive conduct, intimidation, or exclusion from workplace activities.

Prohibited Conduct

CESEL prohibits all forms of harassment, discrimination, victimization, and bullying in the workplace, whether committed by employees, supervisors, managers, clients, vendors, or any other individuals associated with the company.

Examples of prohibited conduct include, but are not limited to:

- Making offensive jokes or comments related to an individual's protected characteristics.
- Displaying or distributing offensive materials, including sexually explicit or racially insensitive content.
- Making unwelcome sexual advances or requests for sexual favors.
- Using derogatory language or slurs related to an individual's race, gender, religion, or other protected characteristic.
- Engaging in physical or verbal threats or intimidation.
- Retaliating against individuals who report harassment or discrimination or participate in an investigation.
- Excluding or isolating individuals from workplace activities or opportunities based on their protected characteristics.

Roles and Responsibility

Maintaining a workplace free of harassment and building an inclusive culture will require the cooperation of all parties in the workplace.

Management will:

- Maintain this policy and ensure that its content is shared with all employees
- Disseminate information and provide education about workplace harassment to raise awareness;
- Investigate all complaints of alleged harassment expeditiously, impartially and, to the extent possible, confidentially; and
- Provide advice to complainants of harassment on internal reporting channels and make counselling available where required.

Employees will:

- Report any incident of observed or suspected harassment within a reasonable time;
- Refrain from committing any acts of harassment in the workplace;
- Refrain from making false claims of harassment; and
- Cooperate with investigations into alleged harassment.

Reporting Procedures

CESEL encourages employees who have experienced or witnessed harassment, discrimination, victimization, or bullying to report such behavior promptly. Reports can be made to any of the following individuals:

- 1. Human Resources Department
- 2. Supervisor or Manager
- 3. Any member of the Leadership Team

Reports can be made verbally or in writing and may be submitted anonymously if desired. All reports will be taken seriously and treated with confidentiality to the extent possible.

Employees who believe they have been subjected to harassment, discrimination, victimization, or

bullying will not be penalized for reporting such behavior in good faith.

Investigation and Resolution

Upon receiving a report of harassment, discrimination, victimization, or bullying, CESEL will conduct a prompt and impartial investigation. The investigation will be conducted by trained

individuals who have no conflicts of interest with the parties involved.

During the investigation, all parties will be treated with respect and provided with an opportunity

to present their side of the story and any evidence supporting their claims.

Upon completion of the investigation, appropriate action will be taken based on the findings. This may include disciplinary action, up to and including termination of employment, for individuals

found to have violated this policy.

CESEL will take steps to prevent retaliation against individuals who participate in the investigation

process or make a complaint in good faith.

Training and Awareness

CESEL is committed to providing training and awareness programs to all employees on the prevention of harassment, discrimination, victimization, and bullying in the workplace. Training

will include information on recognizing prohibited conduct, reporting procedures, and the

consequences of violating this policy.

New employees will receive training on this policy as part of their orientation process, and existing

employees will receive periodic refresher training to ensure awareness and understanding of the

policy.

Review and Revision

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations. Any revisions to the policy will be communicated to all employees

in a timely manner, and training materials will be updated accordingly.

Dated: 10th of December 2023.

Dr. Patrick Tolani

CEO