

PREVENTION OF SEXUAL HARASSMENT POLICY

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1. INTRODUCTION

Alfa Capital Markets Ltd (hereinafter the “Company” or “ACM” or “the Employer” - represented by the CEO) is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. Thus in order to create such a safe and conducive workplace, this Policy has been framed, in line with the provisions of “**The Equal Treatment of men and women in employment and vocational training Law, No. 205(I)/2002**” (hereinafter referred to as the “Law 205(I)/2002” or “the Law”).

The purpose of the Prevention of Sexual Harassment Policy (hereinafter the “Policy”) is to provide protection against sexual harassment at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

This Policy extends to all employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, job seekers, vendors, contractual resources and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

2. DEFINITIONS

Term	Description
Aggrieved Individual	means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.
Competent Authority	means the Minister of Labour and Social Insurance, the Equality Authority.
Internal Sexual Harassment Committee (the IC Committee)	means the Committee which has been constituted to prevent sexual harassment and to receive and effectively deal with complaints pertaining to the same. The current members of the Internal Sexual Harassment Committee are: <ul style="list-style-type: none"> - Mrs. Prokofeva (HR manager), - Mrs. Alexandrou (Senior Compliance Officer and legal expert), and - Mrs. Solonos (DPO and Compliance Officer)
Respondent	means a person against whom a complaint of alleging sexual harassment has been made under this Policy.
Sexual Harassment	means any form of unwanted verbal, non/verbal or physical conduct of a sexual nature, which has the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment. Verbal forms of sexual harassment include socially and culturally inappropriate and unwelcome comments with sexual overtones such as sexually suggestive jokes or comments about a person’s dress or body made in their presence or directed toward them. They also include persistent proposals and unwelcome requests or persistent personal invitations to go out. Non/verbal forms of sexual harassment include unwelcome gestures, suggestive body language, indecent exposure, lascivious looks, repeated winks, and gestures with fingers. It also includes the unwelcome display of pornographic materials, sexually explicit pictures and objects, screen savers or posters as well as sexually explicit e-mails, notes or SMS messages. Physical forms of sexual harassment such as any unwanted contact, ranging from intentionally touching, caressing, pinching, hugging or kissing to sexual assault or rape.
Staff	means all employees of the Company and all the members of the Board of Directors.
Workplace	means not only the specific location where work is being performed (such as an office), but also locations where work-related business may be conducted. These could include:

- Work related social activities, such as a reception organized by the Company for staff or clients, etc.;
- Conferences and training sessions;
- Official business travel;
- Business meals;
- Job interview;
- Work related telephone conversations; and
- Work related communications through electronic media.

3. GOVERNANCE OF THE POLICY

The Human Resources Department (hereinafter the “HR”) is responsible to develop, amend and update this Policy, whenever deemed necessary, in case of any changes in the applicable legislative and regulatory framework or any changes in the Company’s internal policies and procedures. The HR shall communicate this policy to the Internal Sexual Harassment Committee (hereinafter the “IC”) and be endorsed and approved by the Company’s Board of Directors (hereinafter the “BoD” or the “Board”). The BoD is responsible for its implementation and will review it at least once per annum in order to assess its effectiveness.

At the same time, the Compliance Department will review the Policy in order to ensure the compliance with the relevant legislative framework and the company’s internal policies and procedures.

The Management Body shall approve any changes to the Policy and all the documentation regarding the adoption and any amendments thereof should be maintained (i.e. in the minutes of relevant meetings).

4. THE COMPANY/EMPLOYER’S RESPONSIBILITIES

It is the role and responsibility of the Employer, regardless of the size of the Company, to create and maintain a working environment, which is free from sexual harassment. To achieve this, the Company,

- shall inform the employees of the context and measures adopted pursuant to the Law 205(I)/2002 and ensure the application by written announcements via email and/or on board in the workplace with the distribution of printed materials, or orally, providing the relevant training. Formal or informal training which focuses on how to report; prevent and deal with sexual harassment, as well as on the liability of perpetrators in such incidents, should be offered to employees.
- Shall ensure that this Policy is accessible to everyone in the workplace and is communicated to employees in case of updates. The main purpose of this Policy is the internal resolution of any complaint raised within the organisation.
- is obliged to take a complaint into serious account and investigate it thoroughly and objectively, as quickly as possible, ensuring that alleged victims do not have fear of reprisals or feel that their grievances are being ignored or trivialised.
- must take all appropriate action, while the examination procedure is underway, to stop the sexual harassment, lift any unfavourable effect the unlawful actions will have had on the employee who in good faith report incident and protect him/her from possible future instances of the offence.
- must not use the rejection of or submission to the unwanted sexual conduct as a basis for a decision that will affect the aggrieved person in a negative way.
- can be found guilty of the offence, alongside and to the same degree with the person who is responsible for the sexual harassment, if no action is taken to comply with the abovementioned.
- can be held accountable of a failure to act, as mentioned above, even where the sexual harassment is brought to his/her attention by a third party and not by the actual victim of the offence.

5. EMPLOYEES' RIGHTS AND RESPONSIBILITIES

All workers/employees, regardless of their sex, age, position, type of contract or status, have a responsibility to ensure that the workplace is free from sexual harassment, to discourage and report unacceptable behaviour and to comply with the company's sexual harassment policy.

Employees are expected to behave professionally and to exercise good judgment in work-related relationships, whether with fellow employees, business colleagues, or members of the public with whom they come into contact in the course of official professional duties. Further, all employees are expected to take appropriate measures to prevent sexual harassment. **Unwelcome behaviour of a sexual nature will not be tolerated.**

Any employee who believes he or she has been the target of sexual harassment is encouraged to inform the alleged harasser orally or in writing that such conduct is unwelcome and offensive and must stop.

If the employee does not wish to communicate directly with the alleged harasser, or if such communication has been ineffective, the employee is encouraged to report the unwelcome conduct as soon as possible to any member of the IC Committee. Specifically to:

- ❖ Prokofeva Nina (email: nprokofeva@alfacapital.com.cy, phone 22470902)
- ❖ Alexandrou Marianna (email: malexandrou@alfacapital.com.cy, phone 22470951)
- ❖ Solonos Iakovia (email: isolonos@alfacapital.com.cy, phone 22470949)

The HR manager (Mrs. Prokofeva) is the main contact point for questions or concerns about sexual harassment. HR manager has responsibility for investigating or overseeing investigations of alleged sexual harassment. A thorough investigation should:

- Include interviews with complainants, their witnesses, alleged harassers and their witnesses. It is good practice that interviewees be accompanied by a trusted colleague or trade union representative, where applicable.
- Examine all relevant documents, records and personnel files if necessary;
- Provide a written summary of the full investigation to the complainant and the alleged harasser;
- Both parties should be given the opportunity to provide comments on the content of this summary before the full report is finalized;
- If the report is drafted by an independent investigator, the full report should be submitted to the Committee responsible for handling sexual harassment complaints. This report should include who was interviewed, what questions were asked, the investigator's conclusions, and what possible remedies, sanctions or other action may be appropriate.

Support from outside the Company may be used if the complainant is not satisfied with the outcome of internal processes, or has grounds to lack confidence in them. Specifically, the aggrieved individual can lodge a complaint to the following Competent Authorities:

- ❖ **The Gender Equality Committee and the Gender Equality Inspectors (The Ministry of Labour and Social Insurance)**

Though the Gender Equality Committee itself cannot examine the complaint, it will refer it to the Gender Equality Inspectors for investigation. Once the investigation is completed, the Gender Equality Inspectors will proceed with mediations between the complainant and the Company, in order to resolve the issue. If an agreement is reached, the Inspectors will write a report and both parties will then sign it. If an agreement is not reached a "findings" report will be drafted and this can be presented before a Court of Law. If the employee decides to go ahead with this option, the Equality Committee will take all necessary action so that the employee is provided with independent assistance and represented in judicial proceedings.

- ❖ **The Equality Authority (The Ombudsman's Office)**

The Ombudsman will investigate the complaint and if it is found to be valid, she will either act as mediator between the parties to settle the issue or proceed with a Decision, which is binding to the

person against whom it is issued. If the latter refuses to follow the suggestions aimed at terminating the discriminatory conduct, the Ombudsman may issue Orders or impose fines against the guilty party, in order to achieve compliance.

Note: Remember that the abovementioned Competent Authorities will have to decide if your complaint falls under the Equal Treatment of Men and Women in Employment and Vocational Training Law. If it does, they will investigate it.

Key Contact Details

Gender Equality Inspectors

Address: 9 Klimentos, 4th floor, Nicosia
Tel: 22400847
Email: director@dl.mlsi.gov.cy

Gender Equality Committee

Address: 9 Klimentos, 3rd floor, Nicosia
Tel: 22400895
Email: genderequalitycommittee@mlsi.gov.cy

Equality Authority (The Ombudsman's Office)

Address: Era House, 2 Diagorou str.1097
Tel: 22405500
Email: ombudsman@ombudsman.gov.cy

6. PROCEDURES AND GUIDELINES

6.1. Raising Of Complaint

1. Any aggrieved individual may make in writing, a complaint of sexual harassment to any of the members of the IC Committee. Complaints arising of incidents more than three (3) months old shall not be accepted.
2. The complaint should clearly mention name and available details of both the aggrieved person and the respondent. Anonymous or pseudonymous complaints will not be investigated.
3. Where the aggrieved individual is unable to make the complaint on account of her/his physical or mental incapacity or death or otherwise, his/her representative may make a complaint.
4. HR manger will officially forward the complaint to the IC Committee.
5. The complainant shall submit its complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

6.2. Conciliation

Before the IC Committee initiates an inquiry, the complainant may request the IC Committee to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the IC Committee shall record the same and forward the same to the Company and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the IC Committee. The role of the IC Committee acting as conciliator or mediator is not to impose an agreement but to help the parties reach a mutually acceptable agreement.

6.3. Inquiry

- a. In case where a settlement is not feasible or could not be arrived at through conciliation, the IC Committee will conduct an inquiry into the complaint. Additionally an inquiry may also be initiated if the aggrieved person informs the IC Committee that any terms of settlement has not been complied with by the respondent.
- b. The IC Committee shall forward one copy of the complaint thereof to the respondent for obtaining a response.
- c. The respondent shall file his/her reply to the complaint along with list of supporting documents, names and addresses of witnesses.
- d. The IC Committee shall consider the reply from the respondent and initiate an inquiry. IC Committee shall hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
- e. In the event of failure to attend personal hearing before IC Committee by the complainant or the respondent on three consecutive dates (intimated in advance) without sufficient cause, the IC Committee shall have the right to terminate the inquiry proceedings or give an ex-parte decision. However, the IC Committee shall serve a notice in writing to the party (ies), in advance, before such termination or the ex-parte order.
- f. The IC Committee shall provide a report of its findings and recommendation(s) to the CEO and such report and recommendation(s) shall also be forthwith made available to the complainant(s) and respondent(s).
- g. Where the conduct of Sexual Harassment amounts to a specific offence under the Law 205(I)/2002 or under any other law; it shall be the duty of IC Committee to immediately inform the complainant of his/her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and /or any action taken under this Policy.

6.4. Interim Relief

During pendency of the inquiry, on a written request made by the complainant, the IC Committee may recommend to the Company to:

- Transfer the aggrieved individual or the respondent to any other workplace; or
- Grant ability to work from home; or
- Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- Grant such other relief to the aggrieved individual as may found to be appropriate; or
- Restraint the respondent from reporting on the work performance of the complainant.

Once the recommendation of interim relief are implemented, HR manager shall inform the IC Committee regarding the same.

6.5. Prohibition On Disclosure Of Information

This Policy and the Law prohibits any person including IC Committee Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the IC Committee during the proceedings under the provisions of the Law 205(I)/2002. Any violation thereto shall also be subject to the Company's disciplinary procedure and applicable Law.

6.6. Harassment That Falls Outside This Policy

If an aggrieved individual brings to the notice of the IC Committee any instances of sexual harassment where the respondent is not an employee or other individuals covered under this Policy, the members of the IC Committee shall provide assistance to the aggrieved individual, if such aggrieved individual so chooses, to file a complaint with the IC Committee of the respondent's employer or under the Law 205(I)/2002 or any other law for the time being in force, as may be appropriate.

6.7. Protection of Complainant

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue and/or produces any forged or misleading document) will be subject to applicable disciplinary action.

6.8. Appeal

Any person aggrieved by the recommendation of IC Committee may prefer an appeal under the relevant provisions of the Law 205(I)/2002.

6.9. Disciplinary Proceedings

Employees who violate this Policy will be subject to discipline or other appropriate management measures. Discipline will be appropriate to the nature and the extent of the behaviour, and penalties ranging from a letter of reprimand to dismissal are allowed to be applied. Persons who violate this Policy may also be subject to civil damages or criminal penalties.