



**INSTITUTIONAL POLICIES**

**No: 1.05**

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**Responsible: President & CEO**

**ANTI-HARASSMENT AND ANTI-DISCRIMINATION POLICY**

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**RELATED POLICIES**

- **Code of Business Ethics and Conduct**
- **Whistleblower Policy and Ethics Point**

**RELATED DIRECTIVES**

- **Risk**
- **Human Trafficking, Forced Labor and Child Labor**
- **Email and Internet**

**1. Purpose**

At IFDC, our mission is to bring together innovative research, market expertise, and strategic public- and private-sector partners to identify and scale environmentally sustainable solutions for soil and plant nutrition that benefit farmers, entrepreneurs, and the environment. To do this, we need the best out of our employees with each of us responsible for promoting a culture that results in a safe, positive work environment where people can flourish.

The purpose of this Global Anti-Harassment and Anti-Discrimination Policy (“Policy”) is to ensure our staff can thrive in the workplace; free from all forms of harassment including discrimination, sexual harassment and sexual misconduct. This Policy aims to provide IFDC staff with a safe work environment where inappropriate actions and/or intimidating, offensive, or hostile behavior is not tolerated.

IFDC takes harassment and discrimination very seriously and all complaints of harassment will be promptly investigated and resolved. IFDC management will take disciplinary action in cases of harassment (up to and including termination). IFDC management believes that sexual harassment and discrimination are not behaviors that can be tolerated or that can exist unaddressed within the organization.

All IFDC colleagues are owners of this policy. Colleagues who manage or supervise staff have additional responsibilities to report violations and to enforce this policy as set out in Sections 3 and 8 below and need to be familiar with the contents of this policy, regardless of whether formal training has taken place.

Violations of this or any other IFDC policy can be reported through one of the available reporting channels (as listed in Section 3, below). If you have any questions about your obligations under this policy, you should contact your Chief of Party (COP), Supervisor, Supervisor's Supervisor, Human Resources (HR), IFDC's Legal Counsel (LC), or Internal Auditor (IA).

### **1.1 Who is covered?**

This policy extends to all IFDC colleagues (full-time, part-time, temporary, and consultants), including colleagues of any subsidiaries or joint ventures where IFDC has a majority interest or management control. The Policy also applies to staff hosted from other organizations and located at IFDC premises, as well as to IFDC staff when dealing with third parties (e.g., partners, vendors, suppliers, beneficiaries, and guests). If you experience or witness harassment by such a third party, you should report it through the same channels. IFDC will take appropriate action to investigate and remediate the issue.

### **1.2 What is our Company Workplace?**

Our commitment to a harassment-free workplace extends beyond IFDC offices. Harassment is prohibited both in the actual workplace and in any location that can reasonably be regarded as an extension of the workplace.

Harassment can also take place online or through electronic communications. While messaging and posting information online can be a great way to connect with others, always conduct yourself in a manner that is consistent with this policy.

## **2. What is Harassment?**

Harassment includes all inappropriate conduct that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment. Harassment may involve verbal or physical conduct including comments, actions or gestures that affect a colleague's dignity or psychological or physical integrity. Harassment can range from extreme forms such as violence, threats, or physical touching to less obvious actions like ridiculing, teasing, or repeatedly bothering colleagues or subordinates or refusing to talk to them. A single incident that has a lasting harmful effect on a colleague or a series of incidents may be harassment. Victims of harassment can be of the same or different sex, sexual orientation, race, or other status as the harasser.

It is a violation of this Policy to engage in harassment of any kind.

### **2.1 Sexual Harassment**

Sexual harassment is a form of prohibited harassment. Harassing conduct is often, but not always, sexual in nature. These actions can include, but are not limited to unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal or physical conduct based on sex (whether or not sexual in nature). The preceding examples constitute sexual harassment when:

- submission of such conduct is either an explicit or implicit term or condition of employment;
- submission or rejection of the conduct is used as a basis for making employment decisions; or

- the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, offensive, or hostile environment.

## 2.2 Discrimination

IFDC prohibits discrimination against and harassment of any employee or any applicant for employment because of race, color, national or ethnic origin, age, religion, disability, sex, sexual orientation, veteran status or any other characteristic protected under the applicable law and/or regulations. All personnel who are responsible for hiring and promoting employees and for the development and implementation of IFDC programs or activities are charged to support this effort and to respond promptly and appropriately to any concerns that are brought to their attention.

## 3. What is Harassment?

### 3.1 Reporting Options

If you have been subjected to any form of harassment, or if you have witnessed others being subjected to harassment, you can report the incident(s) through [EthicsPoint](#) as soon as possible after the incident occurs. Staff may want to report concerns anonymously through the link given above or call the number specific to your location that is provided on the [EthicsPoint](#) web site. [EthicsPoint](#) is available 24 hours a day and the telephone call is toll-free. It is available to all colleagues, where you can CONFIDENTIALLY and, if you choose, ANONYMOUSLY report any concern in relation to potential breaches of this policy or of other company policies. It is a secure means of reporting, provided by an independent company.

Alternatively, you can also report harassment through any of the following channels:

- your Supervisor
- your Supervisor's Supervisor
- HR
- IFDC's LC
- IA

When a complaint is logged or reported, the complainant will be informed within 5 business days by a Supervisor, HR, LC or IA (whichever is most appropriate) that the complaint was received, and that an investigation will take place. The complainant is also informed when the case is closed.

### 3.2 Reporting Requirements of Supervisors and Managers

Supervisors and managers who receive harassment complaints must report the complaint through [EthicsPoint](#) within 5 business days. Supervisors and managers who become aware or have knowledge of a serious and/or systemic violation of this policy must report as soon as reasonably practicable.

Supervisors and managers are responsible to timely report potential violations of this policy.

Nothing in this policy should be read to condone or encourage independent investigation of complaints under this policy by supervisors and managers. Rather, concerns under this policy should be reported through [EthicsPoint](#) or to HR, LC, or IA.

### **3.3 Investigative Process**

IFDC will promptly investigate thoroughly and impartially any complaint under this policy in accordance with the established guidelines and any remedial or disciplinary actions will be determined. All colleagues are expected to cooperate with investigations undertaken pursuant to this policy. Failure to cooperate in an investigation may result in disciplinary action.

### **3.4 No Retaliation**

IFDC does not tolerate retaliation against any individuals for reporting harassment or assisting another individual in reporting harassment, for providing information related to such report or for opposing conduct that they believe is unlawfully discriminatory or harassing. Any person who believes he or she has been subject to retaliation shall report the conduct using the same reporting procedures as for complaints of harassment. However, if the complainant is determined to have made a false or frivolous case against another employee, the originator of the false case will be subject to disciplinary measures as determined by the President and CEO.

### **3.5 Confidentiality**

IFDC will keep all complaints confidential to the extent reasonably practicable while still fulfilling its obligation to investigate and end any harassing, discriminatory or retaliatory conduct. In each investigation, we will do our best to respect the privacy of all persons involved. It may be necessary to discuss the claims with person(s) with knowledge and the person(s) against whom the complaint was filed. Persons interviewed, including witnesses, may be directed not to discuss any aspect of the investigation with others and the failure to comply with a confidentiality directive may result in disciplinary action.

### **3.6 Personal Relationships**

This Policy does not cover colleagues' private, consensual choices regarding personal relationships. However, consensual personal relationships between colleagues have the potential for conflicts of interest.

### **3.7 Prevention**

Prevention is the best tool to eliminate harassment in the workplace; however, no single person can prevent harassment. All colleagues are owners of this policy. In addition to the obligations to report all incidents of harassment as set out in Section 3, all IFDC supervisors and managers must:

- read and understand this Policy and the implications of non-compliance;
- ensure that colleagues in his or her team understand and comply with this Policy;
- ensure that colleagues in his or her team know they can report any complaint regarding harassment or discrimination, without fear of victimization or retaliation;
- know how and where to file complaints under this Policy and inform colleagues in his or her team how and where to file complaints;
- ensure that this Policy forms part of induction training.

### **3.8 Violations**

Any colleague found to have violated this Policy may be subject to appropriate disciplinary and/or corrective action. This may include but is not limited to verbal reprimand documented to the

employee's record, written reprimand, suspension, reassignment, demotion, or termination of employment.

### **3.9 Global Standard**

This Policy sets out IFDC's standards for addressing and preventing harassment in all IFDC Workplaces.

The standards set out in this policy may be higher and provide greater protection to IFDC colleagues than some local laws. Accordingly, a colleague can violate this policy even if he or she does not violate local laws.

Nothing in this policy is meant to conflict with local law, including labor laws, which can vary from country to country. To the extent that you perceive a conflict between this policy and with local law, please seek guidance from HR, IFDC's LC, or IA as to how this conflict has been resolved.

In the event of any dispute or ambiguity in the interpretation of this policy, the same will be determined by the IFDC CEO or BOD Chair, whose decision shall be final and binding on the point.

Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any colleague under any other rules or law.

### **3.10 Questions and Disclosures**

Questions about the policies or disclosures can be made online through [EthicsPoint](#) or by contacting HR, IA, or the CEO.