

# PROTECTION AGAINST SEXUAL HARASSMENT POLICY OF GFA CONSULTING GROUP

GFA does not tolerate sexual violence or sexual harassment within its working environment at home and abroad. In this regard, article 3 IV of the Allgemeines Gleichbehandlungsgesetz (AGG; General law on equal treatment) already provides appropriate regulations, which apply to all employees. GFA considers it important to protect all members of staff and experts\* from sexual harassment, including those not under the jurisdiction of the AGG.

## THE OBJECTIVE

- Prohibit sexual harassment; expose any kind of sexual harassment where it occurs and effectively counteract it;
- raise awareness of any form of sexual harassment, discrimination, and violence; take preventive measures and provide assistance in the case of assault.

## OUR POLICY

GFA does not tolerate any form of overt or covert sexual harassment in the workplace. GFA does not intend to prevent consensual advances between members of staff or experts. However, an advance cannot be considered consensual if one of the involved parties gives a clear signal that the advance is unwanted.

All members of staff, especially those with training or management tasks, are responsible within their scope of duty for preventing any act of sexual harassment or stopping any such act when brought to their attention, and for considering and treating any such act as a violation of law.

This policy is an amendment of existing principles and regulations governing our activities as a company and as individuals, and as such is an integral part of the core values and goals of GFA.

- **Integrity:** GFA stands for honesty, fairness, equity, transparency, equal opportunities, and the balance of interests.
- **Staff orientation:** GFA stands for trusting cooperation between employees of all genders and respectful interaction on the basis of mutual esteem and appreciation.
- **Responsibility:** GFA takes care that the human right of development of one's sexual identity is respected and guaranteed at any time.

GFA considers interdisciplinary and diverse teams and their interaction in the spirit of mutual respect, appreciation, and tolerance part of its fundamental values. This includes behaviour that respects and adapts to the respective cultural rules and laws of the place of work, including appropriate (business) attire.

GFA supports the equitable cooperation of employees of all genders on all functional levels.

## SEXUAL HARASSMENT

It is considered sexual harassment in the sense of this policy if a sexually motivated action or behaviour is unwanted by a counterpart, is met by explicit resistance, or violates the socio-cultural customs in the relevant country.

### THIS INCLUDES IN PARTICULAR:

- Any sexually oriented behaviour, such as bodily approach, contact, or assault;
- any comment of sexual nature or use of sexually abusive or demeaning language;
- non-verbal behaviour of sexual nature;
- unwanted showing or public exhibition of pornographic images.

It is considered a particularly serious act of sexual harassment if committed by exploiting a work-related hierarchical relationship, by threatening with career-related disadvantages, or by offering career-related advantages.

Sexual harassment constitutes an infringement of personal rights and creates an atmosphere of intimidation and degradation, which can damage a person's job satisfaction and work ability and also be harmful to a person's health.

*\* Gender clause: Throughout this policy, only the male personal pronoun is used in order to enhance the readability of the text and thus facilitate the understanding of its meaning. Wherever a person is designated by the masculine pronoun, the designation refers to all genders respectively.*



## IMPLEMENTATION OF THE POLICY

No GFA member of staff or expert may sexually harass another GFA member of staff or expert. The personal rights and the dignity of every member of staff or expert must be respected, protected and furthered.

GFA protects its members of staff and experts under this policy.

As part of their managerial responsibilities senior executives, superiors, and persons with management tasks are expected to act in an exemplary manner and take care that this policy is respected and implemented by all employees. It is the task of superiors and senior executives to protect employees from sexual harassment as well as false accusations. Under this policy, it is their responsibility to act promptly upon any information regarding a suspicion of sexual harassment in the workplace.

A member of staff or expert who notices a case of overt or covert sexual harassment is expected to show solidarity with the affected person. This means: reacting with empathy, not looking the other way and giving all possible assistance to the affected person. At the least such an observation should be reported to one of the internal contact persons without delay. A misinterpretation is not a false accusation.

It is deemed a false accusation if a case of sexual harassment is made up. A verifiably false accusation of sexual harassment shall be considered a violation of this policy and result in disciplinary sanctions.

## RIGHTS OF AN AFFECTED PERSON

1. A person affected by sexual harassment does not have to tolerate this behaviour. He has the right to challenge the harasser and make it clear that his behaviour is unwanted, is perceived as abusive and derogatory, and must stop immediately.
2. The affected person may confront the harasser directly or, if this is deemed not expedient or too distressing, may contact his superior or one of the contact persons within the company or an external contact person in order to file a complaint, obtain advice, or seek assistance.
3. If the affected person perceives the situation as menacing or unacceptable, he has the right to remove himself from the situation perceived as menacing and even leave the workplace for this purpose. In such a case the superior or one of the contact persons within the company are to be notified as soon as possible.

## CONTACT PERSONS

All contact persons are obliged to confidentiality. They shall treat all personal data disclosed to them with confidentiality and protect an affected person's request for anonymity. Their counselling is provided at no charge.

### CONTACT PERSON WITHIN GFA

#### Susanne Eggers

Phone: +49 (0)40 60306 105

E-mail: [susanne.eggers@gfa-group.de](mailto:susanne.eggers@gfa-group.de)

Susanne Eggers is the GFA commissioner for data protection and privacy, occupational safety, and health management.

### EXTERNAL CONTACT PERSON

#### Niklas Leverenz

Phone: +49 (0) 40 88886860

E-mail: [niklas@leverenz.net](mailto:niklas@leverenz.net)

Niklas Leverenz is an independent lawyer with twenty years of intimate knowledge of GFA.



Both contact person can be contacted directly, via e-mail, or via the **mailbox in the quiet room** (in the basement of the main building in Eulenkrugstraße 82, see photo left).

### OTHER CONTACT PERSONS AND POINTS OF CONTACT

In addition to the contact persons within the company, an affected person may also get in touch with the responsible authorities (e.g. police station) or an external counselling centre, such as:

#### Hotline (Bund)

[www.antidiskriminierungsstelle.de](http://www.antidiskriminierungsstelle.de)

#### Fürstenberg Institut

[www.fuerstenberg-institut.de](http://www.fuerstenberg-institut.de)

Both institutions provide access through a website in English and can be contacted in English or German.

An affected member of staff or expert may also contact the **GFA work council**, phone +49 (0) 40 60306 107, e-mail: [betriebsrat@gfa-group.de](mailto:betriebsrat@gfa-group.de)