



SEXUAL HARASSMENT

Any form of sexual harassment, whether verbal or physical, shall not be tolerated by Adaps at any level.

Sexual harassment includes any unwelcome and uninvited behaviour involving deliberate verbal or physical affront or a sexual nature against another person. It can take different forms such as verbal abuse or lewd comments, questioning about aspects of a person's private life, physical contact or assault, smutty jokes or the public display or erotic material. It does not refer to common courtesy or mutually acceptable behaviour.

It is the Company's policy to thoroughly investigate and remedy any known incidents of sexual harassment. Any employee who feels that he or she has been harassed should register a complaint with top management, or with the appropriate supervisory executive of his or her operating unit in order to resolve the situation.

Complaints shall be investigated thoroughly and as confidentially and quickly as possible. Steps shall be taken to ensure that there shall be no retaliation against a person who files a complaint or participates in the investigation. Disciplinary action shall be taken where appropriate.

- 1.1** ADAPS considers sexual harassment to be an unacceptable form of behaviour which will not be tolerated under any circumstances. All people have the right to work in an environment free of sexual harassment and QMI is committed to its prevention and elimination.
- 1.2** It is the responsibility of all employees to ensure that they respect the rights of their fellow employees, including the right to work in an environment free of any harassment.
- 1.3** Harassment is uninvited, unwelcome behaviour which involves verbal, written or physical affront against a person. The effect of harassment is to offend, humiliate or intimidate another person and to make the workplace uncomfortable and unpleasant.
- 1.4** Sexual harassment is NOT mutual attraction between people – such friendships (sexual or otherwise) are a private concern. Sexual harassment covers a range of unwelcome, unsolicited and non-reciprocated behaviour which constitutes deliberate or unintentional



verbal or physical conduct of a sexual nature. It includes actions which a person finds offensive, such as:-

- Comments, jokes or gestures;
- Phone calls, letters, e-mail messages or computer screen savers;
- Sex-based insults, taunts, teasing or name calling;
- Displays of offensive material eg posters, books and pictures;
- Leering, patting, touching or unnecessary familiarity;
- Unwelcome sexual propositions;
- Indecent exposure, sexual assault or rape;
- Stalking.

It is important that behaviour or comments which may not offend one person may be unwelcome or offensive to another.

1.5 It is possible for a person to be sexually harassed by his or her supervisor or manager, a co-worker, contractor, service provider, client or customer. Sexual harassment is not just unlawful during working hours or in the workplace itself. Such behaviour is prohibited in any work-related context, including conferences, work functions, office christmas parties and business or field trips.

1.6 All reports of sexual harassment will be treated seriously and sympathetically and will be acted upon quickly. Disciplinary action will be taken against anyone found to be guilty of sexually harassing another person or persons. Disciplinary action will also be taken against anyone who victimises or retaliates against a person who has complained of sexual harassment or a person assisting in an investigation. Disciplinary action may include a warning, transfer, counseling, demotion and dismissal.

1.7 Any employee who believes that have been harassed should, where possible, tell the harasser that their behaviour is offensive and that it should stop.

1.8 If the offensive behaviour continues that employee should make a complaint to their manager or supervisor about harassment.



- 1.9** If the problem is too sensitive for a person to discuss with their manager or supervisor a complaint can be made direct to the Human Resources manager.
- 1.10** Upon being told of a complaint of sexual harassment the employee's manager or supervisor or union representative should refer the matter to the senior management.
- 1.11** Upon being told of a complaint of sexual harassment senior management will treat the complaint with the strictest confidentiality. Senior management will investigate the complaint thoroughly in a timely and confidential manner. In investigating the complaint Senior management will pay due respect to the rights of the complainant and the alleged harasser.
- 1.12** In investigating the complaint of sexual harassment senior management will:
- (i) clarify details of what took place and ensure that all necessary information is obtained;
 - (ii) help to clarify whether the behavior actually constituted sexual harassment;
 - (iii) discuss the complaint made with the person accused of sexual harassment;
 - (iv) discuss with the complainant his/her legal rights, including making a complaint to the Equal Opportunity Commission; and
 - (v) identify the outcomes the complainant is seeking.
- 1.13** After investigating the complaint senior management will make a finding on whether a complaint of sexual harassment has been substantiated. If senior management finds that a claim has been substantiated it will ensure appropriate disciplinary action is undertaken.

Paul Halstead
Managing Director

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