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	Issued by: HRD	Approved by: QD	Code: HrPo001

The Policy Statement / Beesline's Commitment

Beesline International S.A.L. strictly abides by and is fully committed to the Lebanese Sexual Harassment Law No. 205, which makes any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature illegal when such conduct creates a hostile or offensive work environment.

Beesline International S.A.L. is committed to providing a safe environment for all its employees free of discrimination on any ground and from harassment at work including sexual harassment.

Beesline International S.A.L. will enforce a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment.

Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence.

No one will be victimized for making such a complaint. In fact, all employees have the right to address & report a complaint, either verbally or written through two boxes, one located at the plant and one at the offices. Both ways shall remain confidential.

Definition of Gender-Based Violence

Gender-Based violence refers to harmful acts directed at an individual based on their gender. It is rooted in gender inequality, the abuse of power and harmful norms.

Gender-based violence (GBV) is a serious violation of human rights and a life-threatening health and protection issue.

Gender-based violence can include sexual, physical, mental and economic harm inflicted in public or in private. It also includes threats of violence, coercion and manipulation.

Definition of Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated.

It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment that is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical Conduct

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- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching.
- Physical violence, including sexual assault.
- Physical contact, e.g. touching.
- The use of job-related threats or rewards to solicit sexual favors.

Verbal Conduct

- Repetitive & undesirable Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes.
- Sexual advances.
- Repeated and unwanted social invitations for dates or physical intimacy.
- Insults based on the sex of the worker.
- Condescending or paternalistic remarks.
- Sending sexually explicit messages (by phone or by email).

Non-Verbal Conduct

- Display of sexually explicit or suggestive material.
- Sexually-suggestive gestures.
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Beesline International S.A.L. recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

All forms of sexual harassment are strictly forbidden at Beesline International S.A.L. and are considered as severe human rights abuse.

Beesline International S.A.L. recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of Beesline International S.A.L., clients, customers, suppliers, subcontractors, or visitors who sexually harasses another will be reprimanded in accordance with this internal policy. Beesline International S.A.L. is responsible for the well-being of its workers especially if harassment occurs during work.

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All sexual harassment is prohibited whether it takes place within Beesline's premises or outside, e.g. at social events, business trips, training sessions or conferences sponsored by Beesline, or outside working hours, e.g. harassing text messages at night.

Complaints Procedures

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome.

Beesline International S.A.L. recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can report the misconduct using the locked complaint boxes available at the company's premises or can approach one of the designated staff members responsible for receiving complaints of sexual harassment.

This person could be a supervisor/line manager/Head of Department, a member of the human resources department, a member of the sustainability division, etc.

When a designated person receives a complaint of sexual harassment, he/she will (with the cooperation of the informed HR department):

- Immediately record the dates, times and facts of the incident(s).
- Ascertain the views of the victim as to what outcome he/she wants.
- Ensure that the victim understands the company's procedures for dealing with the complaint.
- Discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome.
- Keep a confidential record of all discussions at the HR department.
- Respect the choice of the victim.
- Ensure that the victim knows that they can lodge the complaint outside of the company through the legal framework.

In hard cases, Beesline's Disciplinary Committee, headed by CEO and composed of COO & HR Director, will convene upon need as a second tribunal that deals with hard cases or as court of appeal.

Informal Complaints Mechanism

If the victim wishes to deal with the matter informally, the designated person will:

- Give an opportunity to the alleged harasser to respond to the complaint.
- Ensure that the alleged harasser understands the complaints mechanism.
- Facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter.

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- Ensure that a confidential record is kept of what happens.
- Follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped.
- Ensure that the above is done speedily and within two days of the complaint being made.

Formal Complaints Mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior human resources manager to instigate a formal investigation. The senior human resources manager may deal with the matter him/herself.

The person carrying out the investigation will:

- Interview the victim and the alleged harasser separately.
- Interview other relevant third parties separately.
- Ask the harassed if he/she feels comfortable having a “hearing” in the presence of the alleged harasser, this will help decide whether or not the incident(s) of sexual harassment took place.
- Produce a report detailing the investigations, findings and any recommendations.
- If the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e., an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, written warning, suspension, dismissal).
- Follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome.
- If it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace.
- Keep a record of all actions taken.
- Ensure that all records concerning the matter are kept confidential.
- Ensure that the process is done as quickly as possible and in any event within two days of the complaint being made.
- Ensure that the wishes and needs of the victim are incorporated into the outcome of the complaint’s mechanism. For example, if it is found that a victim was harassed by a colleague and that they work together on a daily basis. The victim may not want to be moved to a different department and as the victim, he/she should be entitled to decide this and not be re-victimized by being forced to move within the company.

Outside Complaints Mechanisms

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If the internal investigation didn't satisfy the complainant, he/she will have the right to refer to the governmental institutions or other national mechanisms that may be available to him/her. Beesline International S.A.L. will support the complainant on all the levels.

Sanctions and Disciplinary Measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- Verbal or written warning
- Transfer
- Demotion
- Suspension
- Dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

Implementation of this Policy

Beesline International S.A.L. will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the company.

Every year, Beesline International S.A.L. will require all employees to attend a refresher training course on the content of this policy.

It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

Monitoring and Evaluation

Beesline International S.A.L. recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

Monitoring and evaluation can be done through different means, including questionnaires completed by employees, feedback from victims or those who work in the complaint's procedure.