



Anti-Discrimination & Anti-Harassment Policies and Procedures

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Scope

Ethical Seafood Research is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Ethical Seafood Research expects that all relationships among persons will be professional and free of explicit bias, prejudice and harassment.

Ethical Seafood Research has developed this policy to ensure that all of its employees can work in an environment free from unlawful harassment, discrimination and retaliation. Ethical Seafood Research will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and dealt with appropriately.

Any employee who has questions or concerns about these policies should talk with their line manager or any of the directors.

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid allegations of harassment. The law and the policies of Ethical Seafood Research prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

This policy does not form part of any contract of employment or contract to provide services, and Ethical Seafood Research may amend it at any time.

Individuals and Conduct Covered

These policies apply to all applicants, employees, interns and volunteers, whether related to conduct engaged in by fellow employees or by someone not directly connected to Ethical Seafood Research (e.g. an external consultant or partner).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Equal Employment Opportunity

Ethical Seafood Research will provide equal employment opportunity without regard to race, colour, sex, age, disability, religious persuasion, national origin, ethnicity, marital status, sexual orientation, ancestry, political belief or activity, creed, status as a veteran, or any other status protected by federal, state, or local law, regulation, or ordinance.

The policy applies to all areas of employment, including, but not limited to, recruitment, hiring, training and development, promotion, transfer, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment in accordance with applicable federal, state and local laws.

Ethical Seafood Research will not discriminate against any qualified employee or job applicant with respect to any terms, privileges, or conditions of employment because of a person's physical or mental disability. Ethical Seafood Research will also make reasonable accommodation wherever necessary for all employees or applicants with disabilities, provided that the individual is otherwise qualified to safely perform the duties and assignments connected with the job and provided that any accommodations made do not require significant difficulty or expense.

Management is primarily responsible for seeing that Ethical Seafood Research's equal employment opportunity policy is implemented, but all members of staff share the responsibility for ensuring that by their personal actions the policy is effective and applied uniformly to everyone. Any employees, including managers, involved in discriminatory practices will be subject to disciplinary action, which may include termination of employment.

Harassment Policy

Ethical Seafood Research is committed to providing a working environment that is free from intimidation, hostility or other offences, which might interfere with work performance. Harassment of any sort – verbal, physical, and/or visual - will not be tolerated.

What Is Harassment?

Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. Harassment is unacceptable even if it does not fall within any of these categories.

Responsibility To Keep Work Environment Free Of Harassment

All employees, and particularly managers, have a responsibility for keeping our work environment free of harassment. Any employee, who becomes aware of an incident of harassment, whether by witnessing the incident or being told of it, must report it to their immediate manager or any director.

In addition, Ethical Seafood Research encourages individuals who believe they are being subjected to acts of discrimination or harassment to promptly raise the problem with the person responsible and explain clearly that their behaviour is unwelcome and to request that it be discontinued. Often this action alone will resolve the problem. Ethical Seafood Research recognizes, however, that an individual may not feel comfortable raising the problem informally and may want it to be addressed via the formal process.

When management becomes aware that harassment might exist, it is obligated by law to take prompt and appropriate action, whether or not the victim wants the organisation to do so.

Retaliation

Ethical Seafood Research encourages reporting of all perceived incidents of discrimination or harassment.

On becoming aware of any such incident, it is the policy of Ethical Seafood Research to promptly and thoroughly investigate such reports.

Ethical Seafood Research prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under the applicable procedure.

If an individual wishes to make a formal complaint about retaliation, they should submit it in writing to their manager or person that they report into within Ethical Seafood Research. If the matter concerns their manager, they should submit it to a director. If the retaliation has been witnessed against a colleague or other member of staff, this should be reported to a manager.

The written complaint should set out full details of the conduct in question, including the name of the person who has engaged in the relevant conduct, the nature of the conduct, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

Any staff member who deliberately provides false information or otherwise acts in bad faith as part of an investigation under this policy may be subject to disciplinary action under the applicable procedure.

Complaint Procedure

If an individual wishes to make a formal complaint about discrimination or harassment, they should submit it in writing to their manager or person that they report into within Ethical Seafood Research. If the matter concerns their manager, they should submit it to a director. If discrimination or harassment has been witnessed against a colleague or other member of staff, this should be reported to a manager.

The written complaint should set out full details of the conduct in question, including the name of the person who has been discriminatory or the harasser, the nature of the harassment or discrimination, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

As a general principle, the decision whether to progress a complaint is up to the individual. However, Ethical Seafood Research has a duty to protect all staff and may pursue the matter independently if, in all the circumstances, it is considered appropriate to do so.

Any reported allegations of harassment, discrimination or retaliation will be investigated in a timely, respectful and confidential manner. Where the complaint concerns: i) sexual harassment by a senior employee within Ethical Seafood Research (e.g. a Director or Country Manager) ii) sexual harassment by any other parties who may be directing or have oversight over sexual harassment investigations (iii) any claims made against Ethical Seafood Research's leadership team or a conflict of interest is identified, namely an interest that has the potential to compromise or bias their judgment or objectivity, a party external to Ethical Seafood Research, qualified to conduct an impartial investigation, will be retained to conduct the investigation.

The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have witnessed the alleged conduct or may have other relevant knowledge.

If the manager considers that harassment or discrimination has occurred, prompt action will be taken to address it.

Where an individual is found to have carried out conduct that constitutes harassment or discrimination against an employee the matter will be dealt with as a case of possible misconduct or gross misconduct under Ethical Seafood Research's disciplinary policy (as applicable). If the individual is a third party such as a customer or other visitor, Ethical Seafood Research will consider what action would be appropriate to deal with the problem. Whether or not the complaint is upheld, Ethical Seafood Research will consider how best to manage any ongoing working relationship between the concerned parties.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counselling or disciplinary action as Ethical Seafood Research considers necessary in the circumstances.

Appeals

If a party to a complaint is not satisfied with the outcome, that party may appeal in writing stating the full grounds of the appeal within one week of the date on which the decision was provided or sent. The appeal should be sent to the Ethical Seafood Research's directors, who will then provide information on the next steps in the appeal process.

Confidentiality and Record Keeping

Ethical Seafood Research will maintain confidentiality throughout the investigatory process to the extent reasonably possible and consistent with adequate investigation and appropriate corrective action. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. Breach of confidentiality may give rise to disciplinary action under Ethical Seafood Research's disciplinary policy.

Ethical Seafood Research does not ask or require people making claims of sexual harassment to enter into non-disclosure agreements (where parties do not share any information about the alleged incident).

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.