

DOCUMENT ADMINISTRATION

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Respectful Behaviour Policy

1. Purpose

- 1.1 Gavi is committed to creating a work environment that is safe and professional where employees work together in an atmosphere of mutual trust and where diversity and inclusion are valued. Gavi does not tolerate any form of discrimination or harassment towards and between its employees, which constitute misconduct and may result in investigations and the instigation of disciplinary measures up to and including the termination of an employment contract in accordance with Gavi's Investigation and Disciplinary Procedures.
- 1.2 In an international and multicultural work environment like Gavi, all employees should be aware that their own cultural norms and values may not be shared by other employees, and they should therefore be sensitive to misunderstandings or disagreements based on those differences. At the same time, these differences do not excuse inappropriate behaviour, discrimination or harassment. Within the context of our international and multicultural work environment, all employees are expected to observe the highest possible standards of behaviour and shall treat others with courtesy, dignity and respect.
- 1.3 This Policy defines what constitutes discrimination, harassment, sexual harassment and abuse of authority in the workplace and sets out the roles and responsibilities of management, Human Resources and employees to promote a respectful working environment. In conjunction with the Investigation and Disciplinary Procedures, it establishes the procedures for reporting, investigating and remedying any acts of discrimination or harassment incidents, ensuring due process for those concerned.
- 1.4 Gavi takes no retaliatory actions against those who raise concerns in good faith under this policy seriously and is committed to creating and protecting psychological safety in the workplace.

2. Scope

- 2.1 This Policy applies to all Gavi employees, whether holding an indefinite or fixed-term employment contract with Gavi, as well as secondees, interns and consultants in their relations with one another as well as in their relations with external individuals in connection with their work for Gavi. Provisions of this Policy referring to "employee(s)" should therefore be read as applying equally to secondees, interns and consultants, with any required adjustments owing to their different status.
- 2.2 The Policy also applies to prohibited conduct that occurs outside the Secretariat (for example, during business travel, conferences or other settings in which individuals may find themselves in the performance of their duties), and/or outside working hours (for example, colleagues meeting during evenings or weekends) to the extent that a connection with work

at Gavi exists. Special care needs to be taken on business trips, where employees may work closely together for extended periods away from home. Taking advantage of this proximity to press unwelcome attention on another person could constitute, among others, harassment and employees on business trips should avoid all forms of behaviour that could constitute, or be interpreted as, harassment (e.g., forcing a colleague to join social events, late night meetings in private, etc.).

- 2.3 This Policy covers all forms of discrimination and harassment, including sexual harassment, occurring in the workplace or other environments in which Gavi employees may find themselves in connection with their work for Gavi.
- 2.4 For the avoidance of any doubt, Gavi employees shall be prohibited from engaging in any type of sexual exploitation and abuse to the extent that a connection with work at Gavi exists.

3. Roles and responsibilities

- 3.1 Gavi employees are responsible for helping to promote a respectful work environment by:
 - Treating one another with courtesy, fairness, dignity, consideration and respect for individual differences and backgrounds, including but not limited to nationality, race, colour, sex, ethnic origin, religion, civil status, sexual orientation, beliefs, disability, age or medical condition (see Gender Policy);
 - Attending trainings as required on issues related to the different forms of discrimination and harassment, to increase awareness of these issues and to promote a work environment that is free from hostility, discrimination or harassment of any kind;
 - Being alert to possible discrimination and harassment, and reporting such behaviour when witnessed or made aware; and
 - Maintaining confidentiality when made aware of, or involved in a discrimination or harassment complaint.
- 3.2 In addition, every employee with supervisory responsibilities must:
 - Act as a role model by maintaining a high standard of personal conduct and treating employees fairly and with courtesy and respect;
 - Ensure that employees under their supervision are aware of their responsibilities and rights, and of how to obtain support if needed;
 - Take appropriate action to address any disrespectful behaviour by employees under their supervision;

- Intervene promptly when alerted to alleged or potential acts of discrimination, harassment, dealing with all such incidents promptly, sensitively and confidentially; and
- Assist the rehabilitation of working relationships where possible.

3.3 The Executive Team shall:

- Foster a climate of mutual respect and act as a role model by demonstrating the highest standards of personal conduct;
- Hold all line managers who report to them accountable for compliance with this Policy as part of the assessment of their performance; and
- Ensure that mechanisms to resolve workplace conflicts are available and that concerns or reports about improper workplace behaviours are taken seriously and are responded to promptly and diligently.

3.4 Human Resources shall:

- Act as role models by maintaining a high standard of personal conduct and treating employees fairly and with courtesy and respect;
- Ensure that employees are aware of their responsibilities and rights, and how to obtain support if needed;
- Ensure that there are informal channels to provide appropriate support, assistance and counselling available to employees before, during and after the resolution of discrimination and harassment-related concerns; and
- Assist the rehabilitation of working relationships where possible.

4. Definitions

- 4.1 **“Misconduct”** means any failure by Gavi employees to abide by any rule of conduct established under their employment contract or Gavi’s policies, procedures or guidelines, including but not limited to the Respectful Behaviour Policy and the Code of Conduct in the Human Resources Manual.
- 4.2 **“Discrimination”** is any unfair treatment or arbitrary distinction based on a person’s nationality, race, colour, sex, ethnic origin, religion, civil status, sexual orientation, beliefs, disability, age or medical condition. Discrimination may be an isolated event affecting one person or a group of persons similarly situated, or may manifest itself through harassment.

- 4.3 **“Harassment”** is unwelcome and unwanted conduct that might reasonably be expected or perceived to create a hostile work environment or to interfere with that individual’s ability to do their work at Gavi. In particular, it is any improper and unwelcome conduct directed at an individual that has had, or might reasonably be expected to have, the effect of demeaning, belittling or humiliating an individual, in violation of the right to dignity at work.

Harassment is not defined by the intention of the perpetrator, but rather by the impact of the behaviour on the victim. If a specific action could reasonably be perceived as offensive, humiliating or intimidating, that action may be regarded as harassment, whether or not such harm was deliberate. Therefore, in their interactions with others, employees should always consider how their behaviour could be perceived and avoid behaviour that may create an atmosphere of hostility or intimidation.

4.3.1 Harassment normally involves repeated behaviour or a pattern of behaviour, although it may also take the form of an accumulation of incidents, even if each incident, taken in isolation and out of context, would not be regarded as harassment. Harassing behaviour may take different forms, including sexual harassment (see paragraph 4.4 below). Harassing behaviour may occur in a range of situations, for example:

- From a manager to a team member;
- From a team member to a manager;
- From an employee to a peer, a consultant, an intern, a supplier, etc.;
- Through scapegoating of an individual by a group (“mobbing”).

4.3.2 Harassing behaviour is normally prolonged or persistent behaviour. However, in exceptional situations depending on the circumstances and the gravity of the incident, behaviour that happened once may also constitute harassment.

4.3.3 Examples of behaviours which may constitute harassment include:

- Intimidating behaviour, including threats, shouting, or abusive language or gestures, retaliation acts;
- Offensive comments (especially in public), antagonism, or refusal to communicate;
- Repeatedly humiliating, ridiculing, mimicking or belittling someone, particularly if in front of colleagues. If such actions are done by a person having supervisory powers, this may represent bullying;
- Offensive jokes, sarcasm, gossip or ridicule;
- Repeatedly ignoring or excluding someone from meetings, information and materials necessary for work, and professional activities without a valid business reason; talking across them or not listening to them;
- Racial or sexual epithets, jokes, slurs and negative stereotyping of an individual or group, directly or indirectly;

- Displaying or communicating images or written materials that are offensive, obscene or otherwise create a hostile work environment;
- Making derogatory or otherwise discriminatory remarks about such personal characteristics as racial or ethnic origin, nationality, opinions or beliefs, gender, sexual orientation, health, disabilities, etc.

4.4 **“Sexual Harassment”** is defined as any unwelcome behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, creates an intimidating, hostile or offensive work environment, or is made a condition of employment or career opportunities. Sexual harassment may be verbal (e.g., suggestive innuendoes, jokes of a sexual nature), physical (e.g., unwanted physical contact), or visual (e.g., displaying sexually suggestive objects or pictures), as exemplified in the non-exhaustive list below under paragraph 4.4.2. Sexual harassment may occur between persons of any gender. Anyone, regardless of their gender or sexual orientation, can be either targets or the victims of sexual harassment.

4.4.1 Sexual harassment is particularly egregious when it takes the form of direct or implied threats or promises that submission to sexual advances will be a condition of favourable career treatment. This type of harassment occurs when demands of a sexual nature are accompanied either by the promise of a reward for acquiescence or threats of detrimental action for refusal. This situation typically arises when a more senior person takes improper advantage of their rank or status to try to elicit sexual favours from a subordinate; such behaviour may also constitute an abuse of authority.

4.4.2 Examples of behaviours which may constitute sexual harassment include:

- The repetition of suggestive comments or innuendos of a sexual nature that, even if minor in themselves, gain in offensiveness as they accumulate;
- The exhibition of materials of a sexually oriented nature in the workplace or in a work-related setting, or communicated electronically;
- The use of crude or obscene language or gestures, or the telling of obscene jokes or stories;
- Repeated and/or exaggerated comments about an employee’s personal appearance, or about an employee’s physical features;
- Invitations to social activities or "dates" if they persist after the victim has made clear that they are not welcome;
- Unwarranted, intrusive or persistent questioning about a person’s private life;
- Taking advantage of proximity during travel to press unwelcome attention on another person;
- Direct propositions of a sexual nature, including any link between acceptance of such propositions and conditions of employment, promotion, professional development, etc.;
- Deliberate and unwelcome physical contact, or unnecessarily close physical proximity.

In a multicultural organisation like Gavi, all employees should be aware that their own cultural norms and values may not be shared by colleagues, and they should therefore be sensitive to misunderstandings or disagreements based on those differences. At the same time, these differences do not excuse inappropriate behaviour. In any case, Gavi will look at the impact of the behaviour on the victim, as well as the intent of the perpetrator.

While typically involving a pattern of behaviour, sexual harassment can take the form of a single incident. Sexual harassment may occur between persons of opposite or same sex. Persons of any gender can be victims and offenders of sexual harassment.

- 4.5 **“Sexual Exploitation”** refers to actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- 4.6 **“Sexual abuse”** refers to actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. SEA also includes sexual relations with a child, in any context, defined as a human being below the age of 18 years.
- 4.7 **“Abuse of authority”** refers to harassment committed by an employee who is in a position to influence the career or employment conditions of the target of the harassment (for example, through recruitment, assignment, contract renewal, performance evaluation or promotion). It may also constitute an abuse of authority, which elevates the seriousness of the potential misconduct. Examples of behaviours which may constitute an abuse of authority include:
- Sexual harassment by a manager or person in a position to impact the target’s employment status or career;
 - Requesting colleagues to do personal favours or errands outside the context of the workplace or the target’s work functions; and
 - Pressuring colleagues to distort facts or break the rules.
- 4.8 **“Retaliation”** refers to any malicious direct or indirect detrimental action recommended, threatened or taken because an individual has engaged in a Protected Activity. Retaliatory actions may include, without limitation, harassment, discrimination, inappropriate performance appraisals, salary freeze or adjustment, work reassignments, demotion, termination of employment or the withholding of an entitlement. Retaliation involves three sequential elements:
- An individual’s engagement in a Protected Activity;
 - A direct or indirect adverse action threatened, recommended or taken following such individual’s engagement in the Protected Activity; and
 - A causal relationship between the individual’s engagement in the Protected Activity and the adverse action or threat thereof.

4.9 “Protected Activity” refers to:

- Reporting of suspected misconduct;
- Reporting of misuse or other wrongful activity in relation to a Gavi programme or otherwise acting as a Whistleblower;
- Providing evidence as a witness in the context of an investigation under these Procedures;
- Assisting the Audit and Investigations Department as it may request in the performance of its duties;
- Acting as a witness, accompanying and/or assisting an employee in relation to the Grievance and Appeals Procedures;
- Reporting of concerns regarding the care and conduct of Gavi’s due diligence procedures; or
- Seeking redress under the Grievance and Appeals Procedures.

The anonymous reporting by an employee of suspected misconduct will not be considered a Protected Activity as long as the employee so reporting remains anonymous.

4.10 “Whistleblower” refers to an individual who reports suspected incidents of breaches of laws, rules or regulations in Gavi’s activities or of serious misconduct or serious infringement of Gavi’s rules, policies or guidelines, or any action that is or could be harmful to the mission or reputation of Gavi.

5. Behaviours not constituting harassment

5.1 The SMT members and line managers are expected to give direct and constructive feedback to the employees they supervise and/or manage, and to take appropriate corrective action, including giving clear managerial direction, whenever warranted. This will involve expressing views concerning the work, performance and/or conduct of the employees. The mere expression of a view by a manager regarding work performance, conduct or related issues within a supervisory relationship, or the giving of managerial direction, shall not of itself be considered as harassment, sexual harassment, discrimination or abuse of authority. This is the case notwithstanding that the addressee of those views may disagree with them or that they may constitute or be regarded as admonishment or criticism. Feedback should always be given in a courteous and constructive manner.

5.2 Although various forms of behaviour related to interpersonal conflict in the work environment, such as the occasional raised voice or sarcastic remark, do not necessarily constitute harassment, they are inappropriate and should be avoided, because they undermine professional dignity and can be damaging to the work environment. Moreover, such behaviour may escalate and become harassment if not promptly addressed and stopped. Therefore, if a situation has made employees feel uncomfortable, insulted or isolated, they are strongly encouraged to approach the person(s) involved, either directly or

with assistance from the resources described in Section 6 below, and make their concerns known, even when the behaviour does not rise to the level of harassment. By virtue of their position, managers have a key role in establishing and maintaining a positive and harmonious working environment, including respectful treatment by and towards others.

- 5.3 Close personal relationships of a consensual nature between colleagues do not, in themselves, constitute sexual harassment. However, such relationships between manager and team member or other situations where one of the employees in the relationship is in a position to influence the career prospects of the other (or others in the team) create the risk of an actual or apparent conflict of interest.

6. Reporting and addressing discrimination and harassment

- 6.1 If possible, it is best to deal with inappropriate behaviour by discouraging it at an early stage by speaking up to the person(s) involved. They may not realise the impact that their behaviour has on others and may discontinue once this is brought to their attention. However, in the event that the behaviour continues, or if the complainant is not comfortable approaching the person(s) involved alone, there are both informal and formal channels available for raising concerns and resolving the problem. Under the informal channels, the parties themselves attempt to resolve the concerns about the behaviour in question, which may involve the support or assistance of third parties. Under the formal channels, Gavi applies its internal procedures to establish the facts following a report of inappropriate behaviour and, if appropriate, imposes corrective measures to remedy the situation.

Informal channels

- 6.2 The objective of informal resolution is to create a safe space to raise any concerns over allegedly offensive or unwelcome conduct as soon as possible in a fair, constructive and respectful manner, through open communication and cooperation. Employees are encouraged to participate in informal means of resolution and make good faith efforts to address and resolve the problem before it continues or escalates.
- 6.3 Although the authority or status of the persons involved or other considerations can make direct discussions difficult, employees who believe they are not treated respectfully are encouraged to try and resolve the matter informally by raising it directly with the person(s) involved. However, if the employee feels unable to do so, or if the behaviour persists after they have raised it, they may consult any of the resources provided by Gavi. Regardless of the resource(s) selected by the affected person, these third parties are expected to act with complete neutrality. These resources are also available to those who are alleged to have engaged in harassment.

- 6.4 In addition to their line manager, employees may consult with any managers in their hierarchy line as well as one or more of the following persons to discuss the situation in strict confidence and the options for dealing with it:
- The HR Business Partner of the department
 - The Ombudsman
 - The Staff Council

Formal channels

- 6.5 Employees who consider themselves to be the target of discrimination, harassment, sexual harassment or abuse of authority may submit a written report of alleged misconduct in accordance with Section 7 of the Investigation and Disciplinary Procedures.
- 6.6 Reporting persons are strongly encouraged, but not required, to provide information concerning the name and functions of the perpetrator; the nature, location and dates of any incident(s) or behaviour(s) on which the report is based; the names of potential witnesses, if any, to the incidents or behaviours in question; any documentation in support of the report, such as emails, photos, or medical reports; and any remedial measures sought.
- 6.7 Upon receipt of an allegation or information concerning potential misconduct, a preliminary assessment will be conducted in accordance with the Investigation and Disciplinary Procedures. If warranted, the matter may proceed to a fact-finding investigation. Depending on the outcome of the fact-finding investigation, a disciplinary process may follow.
- 6.8 Although there is no time limit to initiate a formal process, complainants are encouraged to initiate the formal process without unnecessary delay, both to protect themselves and to maximise the chances of relevant information and evidence, including witness testimony, being available.
- 6.9 If Gavi employees are not comfortable with using any of the available reporting channels mentioned above, or having done so, are not satisfied with their response, they should make a Whistleblower report to the Managing Director of Audit and Investigations, who is the designated Compliance Officer under the Gavi Alliance Whistleblowing Policy. Whistleblower reports are made through a variety of means provided under the "Ethics Hotline" tab on Gavi's website where details of the information that the report should contain can also be found.

Confidentiality

- 6.10 All employees who are aware of measures that have been taken or are underway to address alleged inappropriate conduct shall respect the sensitivity and confidentiality of the matter and the person(s) involved. In such cases, employees must refrain from discussing the matter or otherwise sharing information or documentation among themselves or with anyone who does not 'need to know' in order to perform their official duties in connection with this Policy. Every effort must be made to preserve the dignity, rights and self-respect

of the parties to the matter. Any person approached as part of an investigation shall be bound by confidentiality (e.g., not to discuss the matter with anyone outside the investigation team).

Ongoing follow-up and support after resolution of a report

- 6.11 Following receipt of a report of alleged breach of this Policy, the situation will be closely monitored by Human Resources to ensure that all persons involved in the report make the transition to their normal duties as smoothly and quickly as possible. Managers will also monitor their work units for ensuring a respectful workplace environment.

7. Protection from retaliation

- 7.1 Gavi undertakes that no Retaliation shall be taken against employees who engage in a Protected Activity. All allegations of Retaliation will be processed in accordance with the Investigation and Disciplinary Procedures. Examples of Retaliation include negative actions such as, but not limited to, harassment, discrimination, inappropriate performance appraisals, salary freeze or adjustment, work reassignments, demotion, termination of employment or the withholding of an entitlement.

8. Effective date and review of Policy

- 8.1 This Policy comes into effect as of 01 December 2021.
- 8.2 This Policy shall be reviewed and updated as and when required.

References: Grievance and Appeals Procedures
Investigation and Disciplinary Procedures
Conflict of Interest Policy
HR Manual - Code of Conduct
Gender Policy
Whistleblower Policy