REETHI FARU RESORT
RAA ATOLL • MALDIVES

Sexual Abuse and Harassment Policy

Policy Brief and Purpose
Our sexual abuse and harassment policy aims to protect men and women in our company from unwanted sexual advances and give them guidelines to report incidents. We will also explain how we handle claims, punish sexual harassment, and help victims recover.

We won't tolerate sexual harassment in our workplace in any shape or form. Our culture is based on mutual respect and collaboration. Sexual harassment is a serious violation of those principles. We also reaffirm our commitment to comply with laws relating to the Prevention of Sexual Abuse and Harassment Act (16/2014).

Scope
This policy applies to every person in our company, regardless of gender, sexual orientation, level, function, seniority, status, or other protected characteristics. We are all obliged to comply with this policy.
Also, we won't tolerate sexual harassment from inside or outside of the company. Employees, investors, contractors, customers, and everyone interacting with our company are covered by the present policy.

1. Policy elements

What is sexual harassment?
For the purpose of this policy, "sexual harassment" will be interpreted as described in the Prevention of Sexual Abuse and Harassment Act (16/2014) and shall mean a sexual act done against or in relation to a person, by another person, without the consent of that first person. Sexual harassment has many forms of varying seriousness. A person sexually harasses someone when they:

- Insinuate, propose, or demand sexual favors of any kind.
- Invade another person's personal space (e.g., inappropriate touching)
- Stalk, intimidate, coerce, or threaten another person to get them to engage in sexual acts.
- Send or display sexually explicit objects or messages.
- Comment on someone's looks, dress, sexuality, or gender in a derogatory or objectifying manner or a manner that makes them uncomfortable.
- Make obscene comments, jokes, or gestures that humiliate or offend someone.
- Pursue or flirt with another person persistently without the other person's willing participation. Also, flirting with someone at an inappropriate time (e.g., in a team meeting) is considered sexual harassment, even when these advances would have been welcome in a different setting. This is because such actions can harm a person's professional reputation and expose them to further harassment.

The most extreme form of sexual harassment is sexual assault. This is a serious crime, and our company will support employees who want to press charges against offenders.

2. Our resort's rules on sexual harassment

- **No one has the right to sexually harass our employees.** Any individual within our resort found guilty of serious harassment will face immediate termination. In cases where representatives of contractors or service providers are involved, we will require their employer to take strict disciplinary action and/or ensure that the individual is permanently removed from working with us.
- **Sexual harassment is never too minor to be dealt with**. Any kind of harassment can wear down employees and create a hostile workplace. We will hear every claim and punish offenders appropriately.
- **Sexual harassment is about how we make others feel**. Many do not consider behaviors like flirting or sexual comments to be sexual harassment, thinking they are too innocent to be labeled that way. But if something you do makes your colleagues uncomfortable or makes them feel unsafe, you must stop.
- **We assume every sexual harassment claim is legitimate unless proven otherwise.** We listen to victims of sexual harassment and always conduct our investigations properly. Occasional false reports do not undermine this principle.
- **We will not allow further victimization of harassed employees.** We will fully support employees who were sexually harassed and will not take any adverse action against them. For example, we will not move them to positions with worse pay or benefits, or allow others to retaliate against them.
- **Those who support or overlook sexual harassment are as much at fault as offenders.** Managers and HR, especially, are obliged to prevent sexual harassment and act when they have suspicions or receive reports. Letting this behavior go on or encouraging it will bring about disciplinary action. Anyone who witnesses an incident of sexual harassment or has other kinds of proof should report to HR.

3. Committee on Prevention of Sexual Abuse and Harassment

As required by the Prevention of Sexual Abuse and Harassment Act (16/2014), a Committee shall be established by the Human Resources Department with a view to providing protection against sexual abuse and harassment at the workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto. A dedicated policy and procedure for establishing the Committee on the Prevention of Sexual Abuse and Harassment is provided in Annex-1 of this policy.

4. How to report sexual harassment

If you are being sexually harassed (or suspect another person is being harassed), please report it to the HR Manager or your Manager. In serious cases like sexual assault, inform HR that you plan to press charges, and the Police will be involved. We acknowledge it's often hard to come forward about these issues, but we need your help to build a fair and safe workplace for you and your colleagues.

If you want to report sexual harassment within our resort, there are two options:

- **Ask for an urgent meeting with the HR Manager or your supervisor.** Once in the meeting, explain the situation in as much detail as possible. If you have any hard evidence (e.g., emails), forward it or bring it with you to the meeting.
- **Send your complaint via email**. If you address it to your supervisor, please cc HR on the email and attach any evidence or information that can be used in the investigation. HR and your supervisor will discuss the issue and contact you as soon as possible. If you report an assault to the police, our company will provide any possible support until the matter is resolved. In any case, we will ensure you are not victimized and that you have access to relevant evidence admissible in court, like security video footage or emails (without revealing confidential information about other employees).

5. Inadvertent harassment

Sometimes, people who harass others do not realize that their behavior is wrong. We understand this is possible, but that doesn't make the perpetrator any less responsible for their actions.
If you suspect that someone doesn't realize their behavior is sexual harassment under the definition of this policy, let them know and ask them to stop. Do so preferably via email so you can have records. Please do not use this approach when:

- Your manager, an upper manager, investor, or guest is the perpetrator.
- Sexual harassment goes beyond the boundaries of off-hand comments, flirting or jokes.

In the above cases, report to HR as soon as possible.

6. Responsibilities of Managers, HR and the Committee

Human Resources (HR) and managers hold a critical responsibility in fostering a workplace culture of respect, dignity, and trust. Their foremost duty is to prevent sexual abuse and harassment by promoting awareness, accountability, and respectful conduct across all levels of the resort.

However, if an incident occurs and a complaint is made, both HR and managers are required to respond promptly, fairly, and in accordance with the law and resort policy.

Responsibilities of Managers

Upon receiving a complaint, managers must immediately notify HR, and Managers should guide the complainant by explaining the resort's procedures and ensuring they feel supported throughout the process.

Responsibilities of HR and the Committee

When HR receives a complaint, it will refer the matter to the Committee on the Prevention of Sexual Abuse and Harassment. HR, in collaboration with the Committee, will take the following steps:

- **Gather Information:** Obtain a detailed written or verbal account from the complainant, including dates, times, locations, witnesses, and any available evidence.
- **Maintain Confidential Records:** Securely document the report in a confidential file, separate from the employee's personnel records, and continuously update this file with all actions, findings, and communications related to the case.
- **Initiate Investigation:** Conduct a fair, impartial investigation in line with the established procedures. For complex cases, HR may escalate the matter to a senior manager.
- **Check for Patterns:** Review whether similar complaints have been made against the alleged perpetrator. If so, inform their manager that disciplinary action, up to and including termination, may result following the investigation.
- **Inform Complainant of Rights and Options:** Clearly explain the resort's procedures, support services, and legal remedies available.
- **Respect the Wishes of the Complainant:** While taking into account the circumstances and severity of the case, HR should carefully consider whether the complainant prefers informal resolution (e.g., mediation, discreet handling) or formal corrective action (e.g., transfer, disciplinary process).
- **Engage the Respondent:** Meet with the alleged harasser to communicate the complaint and instruct that the behavior must stop immediately.
- **Resolution Pathways:**
    - Arrange mediation sessions (only if the complainant agrees).
    - Initiate disciplinary proceedings where necessary. In cases of sexual assault, coercion, or threats, the harasser will be terminated immediately. Employees convicted in a court of law of sexual assault will be terminated regardless of an internal investigation.

HR or managers must not, under any circumstances, blame the victim, conceal a report, or discourage employees from reporting sexual harassment. If HR or a manager behaves that way, please send an email to their own manager or a senior HR leader explaining the situation.

7. Disciplinary action and repeat offenders

Employees who are found guilty of sexual assault will be terminated after the first complaint and investigation.
Employees who are found guilty of sexual harassment (but not assault) the first time may:

- Be reprimanded.
- Get a "below expectations" performance review.
- See expected promotions and/or salary increases freeze for a year.

We may also transfer harassers or take other appropriate actions to protect their victims. We will terminate repeat offenders after the second claim against them if our investigation concludes they are indeed guilty. We apply these disciplinary actions uniformly. Employees of any sexual orientation or other protected characteristics will be penalized the same way for the same offenses.

8. Helping harass victims

Apart from investigating claims and punishing perpetrators, we want to support the victims of sexual harassment. If you experience trauma, stress, or other symptoms because of harassment, consider:

- Taking a few days of sick leave to restore your mental health.
- Ask HR for medical assistance to cover mental health services.

Your job and benefits will not be jeopardized or altered if you choose any of those options or other means of recovery.

9. Speak up, we listen

Sexual harassment can exhaust those who endure it. Speaking up about this issue is often tough for fear of not being heard, upsetting managers, and challenging corporate culture.

Please don't let these fears deter you. Our company will do everything possible to stop sexual harassment and any other kind of harassment from happening, while supporting harassed employees. We need to know what's going on so we can act on it. And by raising your voice on this issue, you help our company create a happy workplace and thrive.

Peter Gremes
General Manager

Annex 1 - Prevention of Sexual Abuse and Harassment Policy

Establishment of the Committee on Prevention of Sexual Abuse and Harassment

1. Purpose

The purpose of this policy is to establish a Committee on the Prevention of Sexual Abuse and Harassment in compliance with the **Prevention of Sexual Abuse and Harassment Act (16/2014).** This policy aims to foster a safe, respectful, and dignified environment for all employees and guests, while ensuring clear and effective mechanisms for the prevention, reporting, investigation, and redressal of complaints.

2. Establishment of the Committee

a) The Committee on Prevention of Sexual Abuse and Harassment shall be established by the Human Resources Department.
b) The committee shall consist of three members, appointed from among the senior management of the workplace or institution.
c) At least one member shall be female.
d) The members shall elect a Chairperson from among themselves.
e) Any individual who has been subject to disciplinary action for sexual harassment shall not be eligible for membership.
f) External experts may be appointed as members if required.
g) The committee shall be constituted for a period of one year, subject to renewal.

3. Duties and Responsibilities

The committee shall be responsible for:

1. Displaying awareness materials in the workplace stating that sexual abuse and harassment are strictly prohibited by law.
2. Conducting training and awareness programs for employees and guests on the prevention of sexual abuse and harassment.
3. Receiving complaints and, where necessary, collecting evidence, witness statements, and relevant documents.
4. Investigating complaints in accordance with the established procedures.
5. Where complaints constitute criminal offences, guiding the complainant to file a case with the relevant authorities and providing necessary support.
6. Assisting the complainant in restoring rights, benefits, or opportunities that were unfairly denied as a result of harassment.

4. Investigation Process

a) All complaints shall be investigated in accordance with procedures set forth under applicable regulations.
b) Investigations must be completed within 60 days unless otherwise stipulated by law.
c) The complainant shall have the right to:
    - Submit a detailed statement of the complaint.
    - Present witnesses and evidence in support of the complaint.
d) The respondent shall have the right to:
    - Be informed of the details of the complaint.
    - Present a defense and submit evidence or witnesses.

5. Corrective Measures

Upon conclusion of the investigation, the Committee may recommend one or more disciplinary actions, in accordance with the Sexual Abuse and Harassment Policy, taking into account the severity and circumstances of the offence.

All measures taken shall be duly recorded in the employee's file.

6. Complaints Against a Committee Member

In cases where a complaint is filed against a committee member, one of the following shall apply:

a. The complainant may directly approach the relevant Tribunal.
b. The member concerned shall recuse themselves, and the committee will proceed without them.
c. The Human Resources Department or senior-most official shall form a temporary committee with the consent of the complainant.

7. Confidentiality

All complaints, investigations, and outcomes shall be handled with the strictest confidentiality to protect the privacy and dignity of all parties involved.

8. Review of Policy

This policy shall be reviewed annually to ensure compliance with applicable laws and the effectiveness of preventive measures.

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Employee Complaint Form

Your Name: _____ Date:_____

Title: _____ Phone Number: _____

Status: Employee _____ Guest _____ Other (Specify) _____

Department: _____

Address: _____

Complaint Information

Date of Incident: _____ Time of Incident: _____

Location of Incident: _____

Please describe the incident in detail:

_____

_____

_____

_____

_____

_____

If there are others who have witnessed the incident, please provide their names and phone numbers below:

_____

_____

_____

Is this the first time you have raised this concern about this person?

_____ Yes _____ No

Committee on Prevention of Sexual Abuse and Harassment

Composition

The Committee on the Prevention of Sexual Abuse and Harassment at Reethi Faru Resort has been constituted with the objective of providing protection against sexual abuse and harassment in the workplace, as well as ensuring the prevention and redressal of related complaints. Accordingly, a Complaints Committee, comprising the following members, has been established at Reethi Faru Resort for a tenure of one year.

Sr. No.	Name	Designation	Contact Number
01	Mr. Ahmed Nasih	Human Resources Manager	7771170
02	Ms. Tanusree Bose	Front Office Manager	9784709
03	Mr. Ajoy Sreenivasan	Executive Housekeeper	7906296