
	SEXUAL HARRASSMENT AND VIOLENCE POLICY		Revision #: 2.0
			Effective Date: 31/07/2025
Document #: HRM-6.5.1	Prepared by: Emmanuel Tete Darko - Admin & HR Manager	Date: 31/07/2025	
	Approved by: Willem Baert - General Manager	Date: 31/07/2025	

1.0 Policy Statement

We are committed to a safe, respectful, and inclusive environment, free from all forms of abuse and harassment. Our **zero-tolerance** stance applies to any sexual harassment or violence across our operations. All reports will be taken seriously, treated confidentially, and investigated promptly. Retaliation against those reporting in good faith will not be tolerated.

Sexual harassment often stems from power imbalances, especially in hierarchical relationships. Any individual accused of such conduct will be investigated, and appropriate action will follow if misconduct is confirmed.

2.0 Objective

The purpose of this policy is to ensure that PSG's settings including but not limited to workplace, off-site events, compounds and work related travels are free from sexual harassment and violence at all times.



3.0 Scope

This policy is applicable to every person on the Company's premises and off-premises also such as explained in 2.0 above at any time, including but not limited to all staff and their families and friends, contractors, third parties, visitors and suppliers of PSG regardless of gender, role or personal attributes. This policy comes under the ambit of the Socfin group - Policy on sexual harassment and violence.

4.0 Definitions

4.1 Sexual Harassment

- Sexual harassment, as defined by the ILO (International Labour Organization), is any **unwanted sexual behavior** that creates a hostile, intimidating, or offensive environment. It includes:
- **Physical conduct:** uninvited or unwanted touching, assault, or coercion tied or not to job benefits, blocking normal movement or unwanted presence in work area.
- **Verbal conduct:** sexual jokes, comments, advances, or threats, epithets, derogatory comments, slurs, or unwanted sexual advances, invitations, comments or conversation
- **Non-verbal conduct:** explicit messages, inappropriate gestures, stalking, or sharing private images without consent.

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- Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of sexual nature, or any direct or indirect advances that are construed to be sexual in nature through any medium whatsoever. This may take many forms including but not limited to:
 - Visual conduct such as derogatory posters, cartoons, drawings, gestures or intimidating looks/stares.
 - Use of computers, including the Internet and email system, to transmit, communicate or receive sexually-suggestive, pornographic or sexually explicit pictures, messages or materials.
 - Other communications may also include telephone calls, letters, gifts, etc.

Sexual harassment is generally not:

- Genuine compliments at appropriate times.
- Common courtesy.
- Consensual acts of friendship

Anyone, regardless of sex or gender, can be a victim or perpetrator

4.2 Violence in the workplace



Includes, but not limited to intimidation, bullying, stalking, threats, physical attack, property damage or domestic and family violence. This also includes all forms of Gender-based violence.

5.0 Guidelines

PSG has devised the following measures to curb sexual harassment and violence in the workplace which must be strictly adhered to by every individual associated with the Company. PSG will also heighten awareness of partner on partner violence and provide guidance for staff, contractors and third parties in this regard.

PSG will not permit:

- Sexual pranks, or repeated sexual teasing, jokes or innuendos, either in person, phone and/or via email.
- Verbal abuse of a sexual nature.
- Touching or grabbing of a sexual nature.

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- Standing too close to or brushing up against a person.
 - Repeatedly asking a person to socialize during off duty hours when the person has indicated no interest.
 - The unnecessary giving of gifts or leaving objects that are sexually suggestive.
 - Making or posting suggestive gestures.
 - Off-duty unwelcome conduct of a sexual nature that affects the workplace environment, and
- Any form of actions/inactions that can be categorized as sexual harassment as defined in this policy

6.0 Complaint reporting mechanism




Victims or witnesses are encouraged to report incidents through the following channels. When possible, inform the alleged harasser that the conduct is unwanted and unwelcome.

- General Manager
- The Gender Committee Chairperson.
- Compliance officer or Adm/HR Manager.
- Internal/external grievance mechanism.
- Whistleblowing Channels on: Telephone - 030 708 4831 or webpage on <https://report.whistleb.com/en/socfin>

PSG encourages the use of the above channels, however, respects the right of anyone subject to sexual harassment and/or violence to pursue matters independently of this policy through the legal framework applicable to their situation.

7.0 Policy Implementation

- The General Manager or his assignee will ensure the Gender committee receives the necessary resources and training to manage cases effectively.
- The Gender Committee chairperson shall lead in the implementation and monitoring of this policy for, on behalf and with the full support of the General Manager. The chairperson shall offer confidential support to victims. Gender committee will handle all investigation steps discreetly and communicate recommendations to management.
- This policy will be communicated to all workers, contractors, third parties, visitors and suppliers per Internal and External Communication SOPs.

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- Any person whatsoever who is allegedly engaged in workplace violence, as defined by this policy, possesses, uses, or threatens to use an unauthorized weapon, as defined by Ghanaian Law, or engages in off duty violence or misconduct that has a potential to adversely impact on PSG and its employees, suppliers and visitors will be subject to disciplinary process and action including but not limited to termination of employment.
- Contractors, visitors or suppliers found guilty will be blacklisted from the Company and may be subject to legal actions by PSG and/or the Complainant if found guilty of the offence.
- Any false allegation by complainant, when proven, will attract disciplinary actions.

8.0 Disciplinary Measures

Violation of this policy shall be considered as unacceptable and shall be dealt with under the provisions as stated in the documented disciplinary process and where possible will be reported to the appropriate law enforcement agency with the victim's consent for their action.

- Contractors, visitors or suppliers found guilty will be blacklisted from the Company and may be subject to legal actions by PSG and/or the Complainant if found guilty of the offence.
- Any false allegation by complainant, when proven, will attract disciplinary actions.

Confidentiality and non-retaliation

All complaints will be treated confidentially, with sensitivity and respecting anonymity where requested. Those who report or assist in investigations in good faith are protected from retaliation. Any breaches of this clause will result in disciplinary action.