Alice's Kids, Inc. is committed to providing a safe environment for all its employees free from harassment at work including sexual harassment. We will operate 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.

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 which 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. Example of sexual harassment include, but are not limited to: Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching; Physical violence, including sexual assault; Physical contact, e.g. touching, pinching; The use of job-related threats or rewards to solicit sexual favors; Comments on a worker's appearance, age, private life, etc.; 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); Sexually-suggestive gestures; Whistling.

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Alice's Kids, Inc. 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. We recognize 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 Alice's Kids, Inc. clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within Alice's Kids, Inc. premises or outside, including at social events, business trips, training sessions or conferences.

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. We recognize 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 approach a board member. When that person receives a complaint of sexual harassment, he/she will: ¬ 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 ¬ respect the choice of the victim ¬ ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework. herself, refer the matter to an internal or external investigator or refer it to a committee of

| Alice's Kids, Inc. recognizes the importance of monitoring this sexual harassment policy and will ensur that it anonymously collects statistics and data as to how it is used and whether or not it is effective. | e |
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