	ETHICS UNIT	CODE : PO-20-ETHC
		VERSION: 03
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	Page 1 of 15

CONTENTS

1. INTRODUCTION 2

2. PURPOSE 2

3. APPLICABILITY..... 2

4. SCOPE 3

5. DEFINITIONS 3

6. PRINCIPLES AND STANDARDS..... 5

7. ROLES AND RESPONSIBILITIES OF THE PARTIES 5

8. PREVENTION AND MONITORING 7

9. REPORTING AND RESPONDING TO SEXUAL HARASSMENT 7

10. RIGHTS OF THE PARTIES 9


11. ACCOUNTABILITY..... 9

12. OTHER RESOURCES AND CONTACT INFORMATION 10

14. POLICY APPROVAL 10

15. VERSION CONTROL..... 11

ANNEX 1 12

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 2 of 15

1. INTRODUCTION

This Anti-Harassment and Discrimination Policy is designed to reflect the Alliance of Bioversity International and CIAT's (hereafter, the "Alliance") unwavering commitment to integrity, legal compliance, and ethical conduct.

The Alliance is committed to providing a safe environment for all its employees, free from discrimination on any ground and from harassment, including sexual harassment. The Alliance will operate a zero-tolerance policy for any form of sexual harassment, treat all incidents seriously, and promptly investigate all allegations of sexual harassment.

This Policy brings together key elements of the [Alliance Code of Ethics and Conduct](#). The aim is to reinforce key messages and expectations related to ensuring a safe working environment for all our people.

2. PURPOSE

The Alliance is committed to ensuring a safe environment, free from discrimination and harassment (including sexual harassment) in its activities and operations. In line with this commitment, this Policy aims to provide efficient and accountable guidelines for preventing and responding to discrimination and harassment (including sexual harassment).


The Alliance has zero tolerance toward discrimination and harassment (including sexual harassment) and, by adopting this Policy, the Alliance demonstrates both its commitment and its contributions to preventing discrimination and harassment from occurring in the first place, and to ensuring a prompt, impartial, and effective response to allegations of this nature.

This Policy provides a shared understanding of prevention of discrimination and harassment, conduct that represents a breach of acceptable behavior for the Alliance, a series of reporting mechanisms, and an agreement as to the roles and responsibilities with respect to the prevention of sexual harassment.

3. APPLICABILITY

This Policy provides a global framework, respecting all applicable laws and regulations of the countries where we operate. If the Alliance Anti-Harassment and Discrimination Policy differs from local laws and our Policy has more rigorous expectations, the requirements of this Policy are in addition to any other applicable requirements.

As business transactions might involve more than one country, we strive to comply with all applicable laws. Conflict of laws will be referred to the Alliance Legal Office for review.

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 3 of 15

4. SCOPE

4.1 This Policy applies to all employees (including staff members, temporary workers, interns, consultants), Board of Trustees members, and all those who have an employment and/or contractual relationship with the Organization when performing their duties and responsibilities, in their personal conduct inside and outside of the workplace, and when engaging in any outside employment or activity.

4.2 The Alliance will not tolerate any form of harassment (including sexual harassment) or other discriminatory or inappropriate behavior within the workplace. Employees are prohibited from discriminating or harassing others, whether on Alliance premises or elsewhere or during or outside working hours.

4.3 This Policy applies equally to both men and women and provides employees who are the victims of harassment with a series of reporting mechanisms. Non-employees who are harassed by employees can lodge a complaint with the Organization in terms of this Policy, whether discrimination or harassment has taken place in the workplace or during the harasser's employment.

4.4 All people who have dealings with the Organization, whether it is a manager or supervisor, an employee, a consultant, a student, a job applicant, or a member of the public, are entitled to an environment free from intimidation and harassment.


5. DEFINITIONS

Discrimination: Any unjustifiable differentiation between individuals or groups or the unjust or prejudicial treatment of different categories of Personnel, based on such grounds as an individual's race, gender, religion, nationality, ethnic origin, sexual orientation, disability, age, language, or any other protected characteristic under applicable law.

Abuse of authority: Improper use of a position of influence, power, or authority by an individual toward others, whether through a one-time incident or series of incidents. It is particularly serious when the alleged offender uses influence, power, or authority to improperly influence the career or employment conditions of another (e.g., through decisions on assignments, contract renewal, performance evaluation, or promotion). Abuse of authority could include intimidation, expressed or implied threats, blackmail, or coercion.

Harassment: This refers to any unwelcome or offensive conduct that has had, or might reasonably be expected to have, the effect of (1) offending, humiliating, embarrassing, or intimidating another person and/or (2) creating an intimidating or hostile work environment and/or unreasonably interfering with another person's ability to carry out their functions at work.

- Frequency: Harassment normally implies persistent or repetitive events rather than a single or isolated occurrence. However, a one-off incident might be considered harassment depending on its nature and gravity.

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 4 of 15

- Intent: The intention of the perpetrator is not determinative of whether harassment occurred; an act that is reasonably perceived by a person as offensive might constitute harassment regardless of whether it was so intended.


Sexual harassment: Sexual harassment is any unwelcome and unwanted behavior of a sexual nature, whether verbal or physical, that is offensive or creates a hostile or intimidating work environment. It includes unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or perceived to cause offense or humiliation to another when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive work environment.

When sexual harassment is committed by a person in a position to influence the career or employment conditions of the victim, the conduct is referred to as quid pro quo harassment and might also constitute an abuse of authority. Quid pro quo sexual harassment occurs when sexual favors are sought, under either the expressed or implied promise of a reward for acquiescence or expressed or implied threat of detrimental action for refusal. Although this form of sexual harassment typically arises when a more senior person takes improper advantage of his/her position to try to elicit sexual favors from a subordinate, it might also occur between colleagues irrespective of their seniority.

Although typically involving a pattern of behavior, it can take the form of a single incident. Sexual harassment might occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders.

Sexual harassment might take the form of unwelcome physical, verbal, or non-verbal conduct, which could include but is not limited to the following:

- a. Unwanted physical contact, ranging from touching to sexual assault.
- b. Verbal forms of sexual harassment, including unwelcome sexual innuendoes, suggestions, and hints; sexual advances; comments with sexual overtones; sex-related jokes or insults; comments about a person's body; or inquiries about a person's sex life or sexual orientation.
- c. Non-verbal forms of sexual harassment, including unwelcome gestures, whistling, indecent exposure, or the unwelcome display of sexually explicit pictures or objects.
- d. Unwanted messages of a sexual nature that are sent via email, SMS, voice messages, and other electronic means, whether using Alliance IT/devices or personal mobiles/equipment.
- e. Sexual harassment that is linked to recruitment/employment opportunities, promotion, training, development opportunities, or the offer of salary increments or other employee or worker benefits in exchange for sexual favors.

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 5 of 15

Sexual harassment should not be confused with the description of close personal relationships established in the [Alliance Code of Ethics and Conduct](#).

Annex 2 provides a non-exhaustive list of examples of misconduct related to discrimination and harassment (including sexual harassment).


6. PRINCIPLES AND STANDARDS

The Alliance collaborates in the prevention of discrimination and harassment (including sexual harassment) through the following guiding principles. These principles summarize our shared commitment in accordance with the specific provisions set forth in the [Alliance Code of Ethics and Conduct](#).

- 6.1. The Alliance recognizes that harassment in any form has the potential to severely impact mental health and physical well-being, lower productivity, and create divisions within teams, and it is costly to its member organizations. We commit to taking necessary actions to uphold a safe and respectful work environment for all.
- 6.2. The Alliance has zero tolerance for harassment and discrimination. Personnel are responsible for creating a safe culture for everyone and must refrain from any prohibited conduct as defined in this Policy.
- 6.3. Personnel are encouraged to undertake efforts to resolve disputes and to discuss inappropriate behavior at an early stage, if possible.
- 6.4. Managers, at all levels of the Organization, shall make themselves available to anyone who wishes to raise a complaint and should recognize the seriousness of any complaints raised and respect the sensitivity and confidentiality of the matter.
- 6.5. The Alliance commits to investigating credible reported incidents of significant misconduct or harm. While conducting such investigations, the Organization will make every reasonable effort to protect the privacy and confidentiality of those involved.
Non-compliance with, or violations of, this Policy might amount to misconduct and, as such, could result in disciplinary measures in accordance with the relevant disciplinary procedures or personnel policy manuals.
- 6.6. The Alliance commits to raising awareness on the prevention of discrimination and harassment (including sexual harassment). We pledge to prevent discrimination and harassment from occurring in the first place through training and awareness-raising activities.
- 6.7. The Alliance commits to protecting reporting parties who act in good faith from retaliation. We will not tolerate retaliation in any form against anyone for raising concerns or making a good-faith report of sexual harassment.

7. ROLES AND RESPONSIBILITIES OF THE PARTIES

7.1 RESPONSIBILITY OF EMPLOYEES, MANAGERS, AND SUPERVISORS

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 6 of 15

The Alliance is committed to acting ethically, honestly, and reliably. Every staff member is responsible for creating and maintaining a work environment free from harassment, intimidation, and discrimination, in which dignity is fully respected.

7.1.1 Employees are responsible for


- I. Conducting themselves consistent with the [Alliance Code of Ethics and Conduct](#).
- II. Treating each other with understanding, dignity, and respect.
- III. Reporting any suspicion, allegation, or evidence of discrimination or harassment (including sexual harassment), whether they have experienced, perpetrated, or witnessed the behavior in accordance with the provisions of the Whistleblower Policy.
- IV. Cooperating in any investigation related to an incident.
- V. Complying with applicable country legislation.
- VI. Participating in training on the prevention of discrimination and harassment and supporting the Senior Ethics Officer in awareness-raising campaigns.
- VII. Upholding the obligations set forth in this Policy and being aware of their duty of care, which means behaving in a manner that respects and fosters each other's rights and the rights of the people they serve.

7.1.2 Managers and Supervisors are responsible for

- I. Building and promoting an ethical organizational culture and leading by example.
- II. Demonstrating personal compliance with this Policy.
- III. Assisting with the investigation and resolution of complaints.
- IV. Ensuring that measures for the prevention of discrimination and harassment are integrated into relevant core internal processes and practices.

7.1.3 The Organization is responsible for

- I. Championing an ethical organizational culture by actively embracing this Policy and setting the tone.
- II. Providing a safe environment that promotes implementation of this Policy.
- III. Ensuring that all employees have access to, are familiar with, and know their responsibilities pursuant to this Policy.
- IV. Creating awareness of conduct that might be construed as sexual harassment, for example, during staff meetings and onboarding processes.
- V. Providing guidance on how complaints of sexual harassment can be brought to the attention of the employer.
- VI. Acting upon all complaints to ensure that they are resolved promptly, confidentially, and fairly.
- VII. Protecting that all discussions, communications, and actions are handled with sensitivity and utmost confidentiality.
- VIII. Ensuring that all Alliance employees receive regular updates and training about this Policy and its application.

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 7 of 15

- IX. Taking disciplinary measures against any person under the employer’s direction who subjects any employee to sexual harassment.

7.2 CONFIDENTIALITY

The employer will not disclose the name of a complainant or the circumstances related to the complaint to any person except when disclosure is necessary for the purpose of investigating the complaint or taking disciplinary measures.

8. PREVENTION AND MONITORING

8.1. Raising awareness, communication, and dissemination of information toward prevention

The Alliance, through the Senior Ethics Officer, ensures consistent communication and dissemination of information to support effective implementation of this Policy, and to raise awareness about the prevention of discrimination and harassment (including sexual harassment).

These outreach and communication efforts shall ensure that discrimination and harassment materials are distributed to all employees and stakeholders, and that appropriate tools and channels are used for awareness-raising campaigns regarding sexual harassment.


The Alliance will ensure the incorporation of the standards on discrimination and harassment in recruitment documentation, in onboarding materials/sessions, and in courses and workshops.

9. REPORTING AND RESPONDING TO HARASSMENT AND DISCRIMINATION

Anyone who is subject to discrimination and harassment (including sexual harassment) should, when possible, inform the alleged harasser that the conduct is unwanted and unwelcome. The Alliance recognizes that sexual harassment might occur in unequal relationships (i.e., between a supervisor and a direct report) and directly expressing discomfort might not be possible and therefore provides multiple mechanisms to support employees with taking action if they believe that they are being subjected to discrimination/sexual harassment, regardless of who the alleged offender is.

Staff members should be aware of any conduct directed at them that they might construe as unwelcome. In some situations, a person might not realize that his or her behavior is inappropriate or undesirable. As a resolution mechanism, staff members could opt to seek the advice and resolution of their concerns through an appropriate grievance mechanism (managed through Human Resources). Local labor laws and the nature of the concerns will be the determining factors related to this mechanism.

A formal complaint occurs when the complainant presents her/his concerns to the entities/committees authorized by the country laws or to the Senior Ethics Officer using the Alliance Sexual Harassment Complaint

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 8 of 15

Form or by submitting the complaint through Lighthouse reporting mechanisms. This will ensure a prompt and thorough investigation according to the country laws and this Policy.

9.1 Reporting channel

Staff shall report a complaint of discrimination and harassment (including sexual harassment) in accordance with the Alliance Whistleblower Policy.

The Alliance Whistleblower Service is described in Annex 1.

9.2 Alternative reporting channels

Staff can also make a direct report through the following additional channels:

1. **The immediate supervisor:** Employees can convey their concerns in writing to their immediate supervisor; when the offender is the immediate supervisor, then employees should report to the next level up.
2. **Lever directors/department managers/unit heads:** If the concern relates to their supervisor or if the supervisor has not acted on earlier similar complaints, employees can make written reports to their lever director/department manager/unit head.
3. **Senior Ethics Officer:** Employees can convey their concerns in writing to the Senior Ethics Officer.
4. **Committees and entities authorized by country laws:** Employees can convey their concerns in writing to the harassment committee or another entity that has been authorized by country laws.


9.3 Anonymous reports/complaints

Although it is preferred and recommended that employees identify themselves when reporting under the above confidential options in order to assist with the investigation of the matter being raised, an employee can also choose to remain anonymous.

9.4 Investigation and disciplinary action

9.4.1 After the complaint is received by the Senior Ethics Officer, the concern will be reviewed and investigated (if appropriate) in accordance with applicable policies and investigation guidelines.

9.4.2 Upon investigation, if a staff member is confirmed to be involved in discrimination and harassment (including sexual harassment), he/she will be disciplined according to applicable policies and local laws and regulations. The case might also be reported to the police or relevant local authorities if it is a criminal offense, and the Alliance will comply with local labor regulations.

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 9 of 15

9.4.3 During the course of the investigation, the Alliance will ensure that the complainant is protected from any retaliation, and even consider the possibility of reassigning the complainant to a different reporting manager or sub-unit. Any sort of retaliation against the complainant or a witness is strictly prohibited.

9.5 Appeal application

Should an employee wish to appeal against the outcome of a formal harassment complaint procedure, he/she must do so in writing within 10 working days of the receipt of the outcome letter to the Senior Ethics Officer, setting out the grounds of the appeal and stating whether the appeal is with respect to the whole or one specific part of any finding of fact or decision.

10. RIGHTS OF THE PARTIES

The complainant is entitled to

- I. File a complaint.
- II. Immediate action once the complaint has been filed.
- III. Have a readily available fellow employee of her/his choice accompany her/him during the process.
- IV. Be informed about the progress of the complaint.
- V. Be informed of the type of corrective measures that will result from the complaint.
- VI. Receive fair treatment.
- VII. Not be victimized or retaliated against for lodging a complaint of harassment in good faith.

The alleged perpetrator has the right to

- I. Be informed of the complaint.
- II. Be given a written statement of the official allegations.
- III. Be given an opportunity to respond to the alleged complaint.
- IV. Have a readily available fellow employee of his/her choice accompany him/her during the process.
- V. Be informed of the progress of the complaint.
- VI. Receive fair treatment.


11. ACCOUNTABILITY

11.1. Accountability for non-compliance with this Policy

Any staff member found to have violated this Policy and other underlying documents and local laws can be subject to discipline up to dismissal or termination of his/her contract, or, depending on the violation, even referred to local authorities for possible criminal prosecution.

11.2. Protection against retaliation

The Alliance prohibits retaliation against anyone who makes a good-faith report or participates in an investigation of a complaint under this Policy, or who otherwise acts to enforce or uphold this Policy.

	ETHICS UNIT	CODE : PO-20-ETHC
		VERSION: 03
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	Page 10 of 15

Individuals who are found to have engaged in retaliation will be subject to disciplinary action under the Alliance’s internal policies and procedures.


13. RELATED POLICIES/REFERENCES FOR MORE INFORMATION

- Code of Ethics and Conduct
- Delegation of Authority Policy
- Whistleblower Policy
- Disciplinary Policy
- Grievance Policy

For the latest version of the policies, please consult the Policies and Guidelines Dashboard [available here](#).

14. POLICY APPROVAL

This Anti-Harassment and Discrimination Policy shall be approved by the Board of Trustees and will be managed and reviewed by the Senior Ethics Officer. The effective date of this Policy is **3 May 2021**. This Policy supersedes previous policies regarding this subject matter and previous policies are considered rescinded.

	ETHICS UNIT	CODE : PO-20-ETHC
		VERSION: 03
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	Page 11 of 15


15. VERSION CONTROL

VERSION	DATE OF APPROVAL OF THE NEWEST VERSION	DESCRIPTION OF CHANGE	PREPARED BY
00	03/05/2021	First Alliance Global Sexual Harassment Policy	Rose Taremwa Maria Fernanda Bedoya
01	18/07/2024	Changed the URL of Lighthouse Services reporting line in Annex 1 from www.lighthouse-services.com/cgiar to https://www.lighthouse-services.com/AllianceBVlandCIAT	Nicole Demers
02	29/11/2024	Second Alliance Global Sexual Harassment Policy Changed the responsibilities from Human Resources to Senior Ethics Officer	Noukam, Franck Eric Approved by the Board of Trustees
03	12/06/2025	<u>The whole document was reviewed to ensure alignment with the CGIAR Integrated Partnership Anti-Harassment and Discrimination Policy. The scope of the Policy was extended to include any form of harassment and discrimination. Additional definitions included; principles and standards aligned with CGIAR's; the investigation procedures were canceled as they will be included in a separate Investigation Procedures document. Examples of misconduct were included in Annex.</u>	Noukam, Franck Eric


Reviewed by:

Approved by:

	Approved virtually on 3 May 2021
Ingrid Lambert Human Resources Director Vanessa Riveros, Head, Organizational Development Unit	Senior Management Team (SMT)
	12/06/2025
Vanessa Riveros, Head, Organizational Development Unit Senior Management Team	Board of Trustees

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 12 of 15

Executive Committee of the Board of Trustees	
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	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 13 of 15


ANNEX 1: Reporting Channel

Lighthouse Services is the Alliance’s external, independent, anonymous, and secure whistleblower service, which is available 24 hours a day, seven days a week. Staff can report any allegation through the following five channels:

1. *On the website:* Go to <https://www.lighthouse-services.com/AllianceBVlandCIAT>, click on the “Report an Incident” icon, and follow the instructions.
2. *By telephone:*
 - Find and dial your country number. Country numbers are available at <https://www.business.att.com/collateral/access.html>.

After connecting to your country number, dial the hotline number 800-603-2869.

3. *Via email:* Send an email to reports@lighthouse-services.com, including the name of the Alliance of Bioversity-CIAT in the subject and content of the email.
4. *Via mail:* Send the report to Lighthouse Services, Inc., 1710 Walton Rd., Suite 204, Blue Bell, PA 19422, USA. Be sure to include the Alliance’s name in the report.
5. *Via fax:* (215)-689-3885. Be sure to include the Alliance’s name in the report.

	ETHICS UNIT	CODE : PO-20-ETHC
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	VERSION: 03
		Page 14 of 15

ANNEX 2: NON-EXHAUSTIVE LIST OF EXAMPLES OF MISCONDUCT RELATED TO DISCRIMINATION AND HARASSMENT (INCLUDING SEXUAL HARASSMENT)

This Annex provides examples of behaviors that could constitute harassment, bullying, discrimination, abuse of authority, or sexual harassment. These examples are illustrative, not exhaustive, and are intended to reflect diverse regional and cultural contexts within the Alliance.

Given the worldwide reach of the Alliance, cultural norms might also interact with our policies and, if this is the case, always seek guidance from the Ethics Unit for support in interpreting or understanding this Policy.

1. Harassment:

- Use of offensive jokes, ridicule, or gossip targeting personal characteristics such as appearance, gender, sexual orientation, or ethnic origin.
- Racial slurs and negative stereotyping of an individual or group.
- Verbal or written comments intended to demean or belittle someone, such as public criticism.
- Persistent unwelcome questions about personal or family matters, especially in contexts where privacy is culturally valued.
- Display of images or written materials that are offensive, obscene, or objectionable.
- Making disparaging remarks about someone’s accent or language proficiency in multilingual regions.

2. Bullying:

- Setting unattainable goals or deadlines to undermine a colleague.
- Publicly humiliating or ridiculing someone in front of their colleagues.
- Consistently excluding an individual from work-related discussions or decisions.
- Regular setting of clearly unattainable work goals and deadlines.


3. Cyberbullying:

- Sending harassing or threatening messages through email, text, or workplace communication platforms.
- Sharing offensive memes, jokes, or materials about a colleague in group chats or social media.
- Posting derogatory comments about a coworker online.
- Using online forums to spread false claims about someone’s professional qualifications.

4. Sexual harassment:

- Making inappropriate comments about a person’s appearance or body.
- Persistent unwelcome invitations to social events after being declined.
- Unsolicited physical contact, such as touching or hugging, or unwelcome unnecessarily close physical proximity.
- Sending inappropriate or sexually suggestive messages over messaging platforms.
- “Quid pro quo” sexual harassment by a supervisor or person in a position of authority with respect to the target’s employment status.

5. Discrimination:

	ETHICS UNIT	CODE : PO-20-ETHC
		VERSION: 03
	ANTI-HARASSMENT AND DISCRIMINATION POLICY	Page 15 of 15

- Denying opportunities for advancement based on race, gender, or disability.
- Excluding someone from a project due to their perceived national origin or religious beliefs.
- Favoring individuals from dominant ethnic groups in hiring or promotions.
- Penalizing employees for not conforming to traditional gender norms, such as dress or behavioral expectations.

6. Abuse of authority:

- Coercing employees into performing personal tasks unrelated to their work duties.
- Threatening non-renewal of contracts if unreasonable demands are not met.
- Using positional power to force employees to accept unethical practices.
- Favoring relatives or individuals from the same community in recruitment or project allocations.