



PO Box 5523, 00200-Nairobi, Kenya

FIPS SOLUTIONS
No. CLG-82FE92

ANTI-HARASSMENT POLICY

1.0 Introduction

Farm Input Promotions Africa herein referred to as the “Company” is committed to maintaining a safe, respectful, and inclusive work environment, free from all forms of harassment, including sexual harassment, bullying, intimidation, and Gender-Based Violence (GBV). The organization treats such behaviour as unacceptable and unlawful, ensures all complaints are addressed confidentially and fairly, and takes disciplinary action where necessary, in line with the Employment Act, 2007.

2.0 Scope

This policy applies to all employees (*executive team, management and supervisory team, employees on fixed-term or temporary contracts, casual workers, Interns, and consultants*) or persons (Board of Directors, suppliers, contractors, partners, beneficiaries and community members, volunteers) associated with the Company. This policy should be read along with the code of conduct policy.

3.0 Definition of Harassment

a) Sexual Harassment

Sexual harassment refers to any unwelcome conduct of a sexual nature that affects an individual’s dignity, work performance, or creates an intimidating, hostile, or offensive work environment. It may be physical, verbal, written, or visual, and can occur in person or through digital means. Examples include but are not limited to:

- I. Unwelcome sexual advances, propositions, flirtations, or romantic gestures
- II. Conditioning employment benefits, promotions, training, or other opportunities on the provision of sexual favors, including implied or overt threats
- III. Repeated and unwanted invitations for dates, socializing, or personal interaction after rejection or expressed disinterest
- IV. Discrimination or unfair treatment against a person for rejecting an unwanted invitation
- V. Inappropriate or non-consensual touching, patting, pinching, brushing against another person, or sexually suggestive physical gestures
- VI. Repeatedly standing too close or invading personal space in a manner that is intrusive or suggestive
- VII. Making sexually suggestive gestures, facial expressions, or body movements
- VIII. Verbal comments or jokes of a sexual nature, including graphic or derogatory remarks about a colleague’s body, appearance, or clothing
- IX. Use of sexually degrading language, innuendos, or unwelcome intimate conversations
- X. Sending or displaying sexually explicit, demeaning, or offensive messages, images, videos, or other content via email, text, social media, or workplace platforms

- XI. Leaving or giving sexually suggestive gifts, notes, or objects
- XII. Sending written messages, including emails or chat messages, containing sexual innuendo, inappropriate jokes, or intimate propositions
- XIII. Using emojis, GIFs, stickers, or digital symbols with sexual connotations (e.g., suggestive fruits, body parts, gestures) in communication—especially when directed at a specific individual or used inappropriately

All such behaviors are considered serious violations of this policy and may result in disciplinary action, up to and including termination of employment.

b) Other Forms of Harassment

Other forms of harassment include any unwelcome behaviour that demeans, humiliates, or intimidates an individual based on personal characteristics such as those described under discrimination in the code of conduct¹. This may include:

- Gender Based Violence (GBV)- harmful acts directed at individuals based on their gender and includes physical, emotional, verbal, psychological, or sexual abuse, whether occurring in person, online, or within the work-related context
- Verbal abuse, slurs, or derogatory comments
- Offensive jokes or gestures related to a protected characteristic
- Exclusion, isolation, or undermining behaviour in the workplace
- Displaying or circulating discriminatory materials

4.0 Policy Statement

FIPS upholds every individual's right to work in an atmosphere of dignity, safety, and mutual respect. Any person should feel comfortable to express discomfort with harassment without fear of unfair treatment or discrimination. All forms of harassment—whether sexual or otherwise—are treated with utmost seriousness and are considered serious violations of this policy. The organization will take appropriate disciplinary action against any breach, up to and including termination of employment.

5.0 Organizational Responsibilities

The Company will:

- Take immediate action upon receiving any complaint or indication of harassment
- Conduct impartial investigations, including the use of external investigators when necessary

¹ Discrimination is defined in the code of conduct to include: unfair treatment based on race, colour, ethnicity, social origin, social class, political opinion, age, gender, marital status, pregnancy, sexual orientation, health status, age, disability, religion, conscience, belief, culture, dress, language, birth, or any other characteristic protected under international human rights standards or the Constitution of Kenya.



- Implement appropriate disciplinary measures without delay
- Prevent retaliation against individuals reporting in good faith
- Promote awareness and education on appropriate workplace behavior
- Empower managers and representatives to monitor conduct and lead by example
- Involve the Employee Representation Action Team (ERAT) in awareness and enforcement

Reviewed and approved by the Directors and Management: