



Policy Against Discrimination and Harassment

PSI is committed to establishing and maintaining a work environment that fosters harmonious, productive working relationships and encourages mutual respect among team members. PSI does not tolerate discrimination or harassment of our job applicants, contractors or employees by another employee, supervisor, manager, vendor, supplier, customer, donors, sup-recipients, board members or any third party. Any form of discrimination or harassment on the basis of race, religious creed, color, age, sex, sexual orientation, gender identity or expression, national origin, ancestry, citizenship status, religion, disability, marital status, personal appearance, family responsibilities, political affiliation, matriculation, military service or veteran status, genetic information or any other classification protected by applicable federal, state or local laws and ordinances is prohibited and will be treated as a disciplinary matter. The various protected characteristics listed above are referred to in this policy as “Protected Characteristics.”

This policy applies equally to communications via email, Internet, telephone, Skype, text messaging, voice mail, social media, facsimile or any other electronic means of communication.

Harassment Defined

Harassment as defined in this policy is unwelcome verbal, visual or physical conduct—based on an individual’s Protected Characteristics—creating an intimidating, offensive or hostile work environment that interferes with work performance. Harassment can be verbal (e.g., slurs, jokes, insults, epithets, gestures or teasing), graphic (e.g., offensive posters, pictures, symbols, cartoons, drawings, computer displays or emails) or physical conduct (e.g., physically threatening or touching another or blocking someone’s way) that denigrates or shows hostility or aversion toward an individual because of any Protected Characteristic. Such conduct violates this policy, even if it is not unlawful. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a professional and respectful manner.

Sex-Based Harassment and Sexual Harassment Defined

Sex-based harassment is a distinct form of harassment based on an individual’s sex. An example is making offensive comments about women in general. Sexual harassment is unwelcome conduct of a sexual nature, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities and other verbal or physical conduct of a sexual nature. Sexual

harassment may occur between members of the opposite sex or members of the same sex, regardless of their sexual orientation or gender identity.

Examples of conduct that violate this policy include:

- Unwelcome sexual advances, flirtation, leering, whistling, touching, pinching, assault or blocking normal movement.
- Sexual misconduct such as requests or demands for sexual favors in exchange for favorable treatment.
- Obscene or vulgar gestures, posters, photographs or comments.
- Sexual jokes or comments about a person's body, sexual prowess or sexual deficiencies.
- Propositions or suggestive or insulting comments of a sexual nature.
- Derogatory cartoons, posters, photos or drawings.
- Sexually-explicit emails, text messages, messages on social media or voicemails.
- Uninvited touching of a sexual nature and/or sexual assault.
- Unwelcome sexually-related comments.
- Conversation about one's own or someone else's sex life.
- Conduct or comments consistently targeted at only one gender, even if the content is not sexual.
- Teasing or other conduct directed toward a person because of the person's gender.

Please note that the above is not an exhaustive list and any unlawful conduct which is based on sex can constitute sexual harassment. All such conduct is unacceptable in the workplace and in any work-related setting. For purposes of this policy, the term "workplace" includes: the physical space in which we work, any location where employees conduct PSI business, work-related travel, work-related retreats, PSI-sponsored business or social events, as well as all of PSI's electronic communications systems.

Unique Nature of PSI's Work

Due to the unique nature of PSI's work marketing condoms and other contraceptives, providing and promoting sexual and reproductive health services and educating people about sexual and reproductive matters, employees who join PSI must understand and acknowledge that business-related discussions regarding sex-based topics and issues are a normal and integral part of accomplishing our mission. By accepting employment at PSI, each employee acknowledges and accepts that they will collaborate in this unique work environment.

PSI recognizes that expectations regarding appropriate workplace conduct are higher and broader than those imposed by the law, such that it is possible for workplace conduct not to violate the "letter of the law" but to still violate our policy and, therefore, such unprofessional conduct may subject employees to corrective action, up to including discharge.

We realize that individuals come to the workplace from a wide variety of backgrounds and with a wide range of personal values and experiences. This policy provides guidance regarding behavior that PSI prohibits, regardless of an individual's position in the organization, length of employment at PSI and regardless of whether the behavior is or was considered acceptable in other workplaces, cultures or settings in which the person engaging in the behavior has lived or worked.

Procedures for Reporting Harassment

The following steps are in place to ensure the work environment at PSI is free of discrimination and harassment. If an employee believes that an individual has violated this policy, the employee should immediately report the perceived violation in accordance with the following Reporting Procedure.

Employees who believe that they have been treated in a discriminatory or harassing manner based on any Protected Characteristic may, but are not required to, clearly and directly advise the individual that the behavior is unwelcome, and request that the behavior discontinue. This action alone may in some cases resolve the problem. If an employee does not feel comfortable approaching the individual or if the behavior continues, the employee should report the incident as follows:

1. An employee should report the concern promptly to his or her manager or supervisor, Human Resources (i.e., Business Partners, Director or Chief). **Any manager who receives a complaint, or who learns of an employee's concern about a possible violation of this policy—whether formally or informally—must immediately report the issues raised to Human Resources.**
2. Employees may make a report to EthicsPoint, an outside firm retained by PSI for this and other reporting purposes, using the contact information below. EthicsPoint is responsible for passing on reports they receive to PSI management or the PSI Board of Directors, as applicable, so that the appropriate actions may be taken to address concerns raised. EthicsPoint may be contacted through any of the following methods:
 - Toll free number: 888-238-1438
 - This direct link: <http://www.psi.ethicspoint.com>
3. If an employee makes a complaint under this policy and no steps are taken to investigate the complaint within five business days, the employee should contact the Chief Human Resources Officer or the Chief Executive Officer.

Investigation Procedures

PSI will promptly investigate the facts and circumstances of any claim of discrimination or harassment. PSI will endeavor to keep the reporting employee's concerns confidential to the extent possible; however, confidentiality cannot be guaranteed to the extent that maintaining confidentiality impedes the ability to investigate and respond to the complaint. Where appropriate, PSI may use outside experts to investigate a complaint of discrimination or harassment.

During the investigation, PSI will:

- Interview the complainant and the alleged harasser.
- Conduct further interviews to the extent required.

- Document the findings regarding the complaint.
- Document recommended follow-up actions and remedies (as required).
- Inform the complainant of the closure of the complaint.

Upon completion of the investigation, PSI will take corrective measures against any person who has engaged in conduct in violation of this policy, where necessary. These measures may include, but are not limited to, counseling, suspension or immediate termination. Anyone, regardless of position or title, whom PSI determines has engaged in conduct that violates this policy will be subject to discipline, up to and including termination.

No Retaliation

No employee will be subject to—and PSI prohibits—any form of discipline or retaliation for reporting perceived violations of this policy in good faith, pursuing any such claim or cooperating in any way in the investigation of such claims in good faith. If an employee believes someone has violated this No Retaliation Policy, the employee should use the Reporting Procedures outlined in this policy.

Anyone, regardless of position or title, whom PSI determines has engaged in conduct that violates this policy against retaliation will be subject to discipline, up to and including termination.

Preventing Discrimination and Harassment

PSI believes that a clear policy against discrimination and harassment, coupled with ongoing training of all employees, will help ensure that all PSI employees are aware of our position regarding these behaviors. PSI requires all employees to participate in annual Code of Conduct training to include harassment and sexual harassment.

We cannot remedy claimed discrimination, harassment or retaliation unless you bring these claims to the attention of the appropriate PSI representatives. Failure to report claims of discrimination, harassment and/or retaliation prevents us from taking the necessary steps to remedy this problem.