



Pan-African Space Industry_ ANTI- HARASSMENT POLICY

Resolution of the Administrative Board of the Pan-African Space Industry

September 2024

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Article 1: Approval of Anti-Harassment Policy

The Administrative Board of the Pan-African Space Industry (PSI) has officially approved the implementation rules for the anti-harassment policy. This policy is designed to create a safe and respectful environment for all members of the PSI community.

Article 2: Introduction

The Pan African Space Industry (PSI) is committed to maintaining an environment free from bullying and harassment, which can be a form of workplace discrimination. All employees have a right to work in an environment free from bullying or harassing conduct, including sexual harassment. The Company requires that all employees (including freelancers) refrain from bullying or harassing anyone, including coworkers, members of the public, vendors, and clients. This anti-harassment policy covers various forms of harassment, such as verbal, physical, online, and sexual harassment. The policy sets forth the PSI's fundamental expectations and requirements regarding how the management, employees and freelancers treat and interact with one another and those we come into contact with in connection with working for or with PSI. While some provisions in this policy outline legal standards and requirements, this policy requires a higher standard of conduct and respect than merely refraining from legal infractions.

Article 3: Policy Statement

- This policy applies to all employees (including freelancers) and to non-employees who bully or harass others under-representation of the company.
- The Pan-African Space Industry will not tolerate harassment of any kind. A confirmed complaint of harassment will result in disciplinary action, up to and including termination.
- This policy will be distributed to all current employees and will be readily and exclusively accessible to every employee and freelancer on the PSI platform. The policy will also be distributed to new employees and freelancers during orientation.
- Individuals who report bullying or harassment in good faith are protected from retaliation by PSI management or any affiliated person to the Pan-African Space Industry. Retaliation includes but is not limited to employee discipline, discharge, further acts of discrimination, or other adverse actions when those acts are intended to punish an employee for reporting harassment, opposing discrimination, or filing or assisting with a complaint to local, state, or federal antidiscrimination agencies.
- The Pan-African Space Industry will promptly investigate complaints of bullying, harassment, or retaliation. Such investigations will be fair and impartial. All employees of the Pan-African Space Industry are required to cooperate with investigations of workplace bullying, harassment, or retaliation.

Article 4: Definitions

Bullying is verbal or physical conduct that seeks to harm, intimidate, or coerce another person. Bullying is not necessarily based on a person's membership in a protected category like race, sex, age, or disability, among others.

Harassment is persistent and unwelcome conduct because of any of the bases protected by law (race, sex, age, disability, etc.). Harassment exists whenever



- Submission to harassing conduct is made, either explicitly or implicitly, a term or condition of an individual's employment,
- Submission to or rejection of such conduct is used as the basis for an employment decision affecting an individual.
- The conduct interferes with an employee's work or creates an intimidating, hostile or offensive work environment.

In broader terms, Harassment includes, but is not limited to, unwanted conduct (whether verbal or otherwise), offensive behavior or bullying which is based on individual circumstances, which includes, but is not limited to their, gender, race, disability, physical appearance, ethnicity, nationality, sexual orientation, age, religion, belief, or status. Forms of harassment can include, but are not limited to, physical contact, jokes, offensive language, slander, gossip, offensive songs and letters, posters, obscene gestures, symbols, offensive screensavers or e-mail, isolation, non-co-operation or exclusion, coercion for sexual favors, pressure to participate in political/religious activities, intrusion by pestering, spying or stalking.

Article 5: Sexual Harassment

Sexual harassment is one type of harassment and includes unwelcome sexual advances, unwelcome physical contact of a sexual nature, or unwelcome verbal or physical conduct of a sexual nature. Unwelcome verbal or physical conduct of a sexual nature includes the repeated making of unsolicited, inappropriate gestures or comments and the display of sexual materials not necessary for our work.

An employee shall be sexually harassed in that employee's employment if that employee's employer, or a representative of that employer.

- a) directly or indirectly makes a request of that employee for sexual intercourse, sexual contact, or any other form of sexual activity that contains.
- b) an implied or express promise of preferential treatment in employment.
- c) an implied or express threat of detrimental treatment in employment.
- d) an implied or express threat about the present or future employment status of the employee.
- e) uses language whether written or spoken of a sexual nature.
- f) uses visual material of a sexual nature; or
- g) shows physical behavior of a sexual nature.

Which directly or indirectly subjects the employee to behavior that is unwelcome or offensive to that employee and that, either by its nature or through repetition, has a detrimental effect on that employee's employment, job performance, or job satisfaction.

Article 6: Discrimination and Harassment Prohibited

1. Verbal:

Comments, jokes, or epithets that are offensive by reason of, or that make derogatory references concerning any protected characteristic; repeated sexual innuendos, sexual epithets, derogatory slurs, sexual jokes, propositions, threats, or suggestive or insulting sounds or foul or obscene



language; questions about another's sex life or experiences, requests for sexual favors, or repeated unwelcome requests for dates;

2. Visual/Non-Verbal/Recorded

E-mail, voice-mail messages, or any electronic communications that are offensive by reason of, or that make derogatory references concerning any protected characteristic; suggestive objects or pictures; graphic commentaries; obscene emails, text messages, or instant messages; leering; or obscene gestures.

3. Physical

Unwarranted physical contact including touching, grabbing, groping, or fondling; interference with an individual's normal movement; or assault;

Article 7: Prevention of Harassment Procedure

Except in cases where the individual agrees that an informal approach is preferable to satisfactorily resolve a concern relating to harassment, they should have the opportunity to have such a complaint formally dealt with through a Prevention of Harassment Procedure outlined below.

1. Key Requirements & Investigations

- Where an informal approach is unsatisfactory to the employee, freelancer or user, individuals should be directed to submit a complaint concerning harassment in writing to the Administrator.
- Investigation of complaints should be dealt with within a reasonable timescale. Investigations will be carried out by the Administrator or PSI management personnel unconnected to the complaint. Where the complaint is against either of them, the investigation should be carried out by the Pan-African Space Industry management.
- Where witness evidence is obtained it should be recorded in a witness statement and copies provided to the individual interviewed so they can sign to Pan-African Space Industry if they are content with its content.
- Investigations should be carried out with sensitivity and respect for the rights of both the complainant and the alleged harasser. Where appropriate a timetable should be set for the investigation, and investigations should be thorough, impartial and objective. Consideration should be given to whether the complainant and alleged harasser should work apart whilst the complaint is under investigation. In certain circumstances, it may be necessary to suspend an employee on full pay for some or all the period during which the complaint is being dealt with. In these circumstances, such a suspension will not constitute disciplinary action, and will purely act as a solution to a potentially sensitive situation.
- The process should be managed in a language that the employee understands or alternatively a translator should be provided to the employee.
- A detailed written record should be made of formal meetings.
- All employees involved should be given reasonable notice in writing of meetings, details of the complaint and be advised of their right to be accompanied.
- Meetings will, where appropriate, be conducted by the administrator, who will explain the purpose of the meeting and the nature of the complaint.



- A member of Executive Management should also be in attendance.
- Employees will have the right to present their complaint and to be accompanied by a work colleague at all formal hearings relating to this procedure.
- The individual should have the opportunity to appeal once against the decision, in which case the appeal, where possible, will be carried out by a person in management not directly involved with the original complaint or the previous meeting. The decision on the appeal will be final.
- The Pan-African Space Industry will endeavor to maintain confidentiality in respect of all concerns raised where possible and appropriate. Throughout the process the importance of maintaining confidentiality by all those involved will be stressed as being crucial to the successful resolution of the complaint. A breach of confidentiality may give rise to separate action under the disciplinary procedure up to and including dismissal.
- All employees and freelancers, including anyone against whom a complaint has been raised, should always cooperate with the investigation of the complaint.
- Individuals raising a complaint will not be penalized directly or indirectly for raising a concern, unless that concern was unfounded and was not raised in good faith.

2. Complaint Procedure

If you experience or witness conduct in violation of this policy at a PSI representation or a related outreach, submit a complaint concerning harassment in writing immediately to PSI management or the PSI Human Resource Directory at mbtechservices2023@gmail.com. PSI shall establish an anonymous reporting mechanism that shall be used by everyone to protect the identity of the complainant.

PSI may also contact or facilitate contact with local law enforcement, local support services, to assist you in feeling safe for the duration of the representation, as appropriate based on the specific circumstances.

The Human Resources / Chief of Staff or PSI administrator will initiate investigations and schedule meetings with the complainant and the alleged harasser.

Any Team admin, general manager, HR representative, or person designated to receive complaints of violations of this policy must submit the report to the PSI COS and/or Ethics Committee. Complaints can also be made using the Employee Complaint Form that will be annexed to this policy. Using the form is not required, however. This policy does not require reporting the offending conduct to a direct supervisor, any individual who is engaging in or permitting the conduct, or any person with whom the reporting party is uncomfortable discussing such matters.

After a report is received, PSI will acknowledge receipt to the Complainant in writing and undertake a fair, thorough, impartial, and objective investigation that reaches reasonable conclusions based on the information collected. While the investigation process may vary from case to case, upon receipt of a complaint, PSI will conduct a review of the allegations. In addition, PSI may, in its discretion, undertake interim measures while the investigation is pending, such as exclusion from PSI activities.

Investigations will be timely, impartial, and conducted by qualified personnel. PSI retains the right to hire outside entities to conduct an investigation. Both the person(s) raising the complaint and the person(s) about whom the complaint was made will be permitted to provide information that may be



relevant to the investigation. The investigation will be completed in a timely manner and the complaining party will be advised that the investigation has been completed and will be informed of the resolution where possible. The individual about whom the complaint was made will be informed of the outcome and, if the PSI determines that this policy has been violated, will be subject to appropriate remedial measures. While absolute confidentiality cannot be guaranteed, confidentiality will be maintained to the extent practical and permitted by law, and information will only be shared with others on a need-to-know basis.

PSI will preserve all complaints and records from an investigation for up to five (5) years. All necessary measures will be taken to ensure the privacy and confidentiality of such reports.

3. Consequences

- An investigation of a complaint of an incident of harassment that has been perpetrated by an employee or freelancer will be dealt with under the disciplinary procedure and may result in dismissal. For Contract employees, this may result in the termination of the contract under which their services are provided to the Pan-African Space Industry. For freelancers, this may result in termination of the contract under which their services are provided on behalf of the Pan-African Space Industry. Such termination may be immediate and without compensation.
- The Pan-African Space Industry takes these matters very seriously. However, malicious complaints of harassment can destroy the career of a colleague. An employee making false accusations of harassment or providing false information with regard to a complaint will be dealt with under the disciplinary procedure. Such action will be deemed potential gross misconduct.

4. External Remedies Available

Harassment because of a protected characteristic (race, sex, age, disability, etc.) is illegal under applicable local, state, and federal laws. Aside from the PSI's internal process, employees or clients may choose to pursue legal remedies with appropriate continental space entities or the courts of law in that specific country (where the harassment has been committed) at any time.

Article 8: Harassment & whistleblowing

Harassment includes any unwelcome behavior that creates a hostile work environment, while whistleblowing involves reporting significant concerns such as fraud or corruption.

Staff should report harassment to their supervisor, Human Resources, or via the confidential reporting system. For serious concerns, reports should be made to a supervisor or the Whistleblowing Officer (Chief of Staff), with an option to escalate to the Ethics Committee (TBD) if necessary. External reporting is permitted only after all internal avenues have been exhausted. Confidentiality will be maintained, and retaliation against those who report in good faith is strictly prohibited. All reports will be investigated promptly, with feedback provided while respecting confidentiality. Support and guidance are available for staff unsure about reporting, and regular training will ensure awareness of these procedures.

Article 9: Effective Date

These policies and guidelines will be reviewed annually to ensure they remain effective. They take effect on the day following adoption.

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