The Business Case for Investing in Women's Employment in Lebanon

COMPANY INSIGHT

HOLDAL Abou Adal Group, Lebanon

Advancing Gender Diversity through Effective Anti- Sexual Harassment Mechanisms

2022

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Mashreq Gender Facility
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Chamber of Commerce Industry and Agriculture
of Beirut and Mount-Lebanon في بيروت وجبل لبنان

FOREWORD BY THE WORLD BANK GROUP

The International Finance Corporation (IFC) and the World Bank are partnering with the Chamber of Commerce, Industry and Agriculture of Beirut and Mount-Lebanon (CCIA-BML) to help remove barriers to women's participation in Lebanese workplaces and build a community of companies dedicated to hiring, retaining, and promoting women.

Since September 2019, Lebanon has seen its largest economic crisis, negatively affecting business activities at all levels. This has been exacerbated by the massive explosion that rocked the Port of Beirut last year and the COVID-19 pandemic. Together, these have left more than 50,000 more women in Lebanon unemployed, compared to 2018/2019. Lebanon also has among the lowest female labor force participation rates in the world, at 25 percent compared to 76 percent in men. That wide gap has deep social and economic implications. We at the World Bank Group recognize that access to economic opportunities is essential for both men and women to live dignified lives and become active social agents.

Attracting, retaining, and promoting women is also good for companies. It allows them to harness talent, making them more productive and competitive. In the bigger picture, raising female employment contributes to economic growth and supports poverty reduction. Our recently published State of Mashreq Women Flagship Report found that if Lebanon raised its female labor force participation rate to 31 percent, its annual economic growth rate would increase by 1.1 percentage points by 2035. Amid the ravages of COVID-19 and the economic crisis, boosting female employment would act as a catalyst for Lebanon's economy, making it stronger and more inclusive.

As difficult as the past two years have been for Lebanon, it has allowed us to re-imagine workplaces and reflect on what those mean for Lebanon's women. We have been inspired by the agility of some Lebanese companies who have shifted to more flexible, healthy, and inclusive work models, responsive to women's needs.

Under a platform created with CCIA-BML, we have launched a series of company insights to showcase Lebanese companies that have created more gender-responsive workplaces. These highlight three thematic areas:

- Promoting anti-sexual harassment policies at the workplace, based on the experience of the Holdal Abou Adal Group,
- Fostering productivity and well-being through family-friendly policies, as Malia Group is doing, and
- Promoting and supporting women in leadership positions, as exemplified by ITG Holding.

We hope these company insights will inspire other businesses in Lebanon to develop and test similar solutions and create more gender-aware and responsive work environments. Our utmost gratitude to CCIA-BML for championing this important agenda and to the three participating companies for generously sharing their data and good practices. Thanks also to the governments of Canada and Norway for supporting the five-year Mashreq Gender Facility, through which we are launching these cases studies, alongside the governments of Lebanon, Iraq, and Jordan who work directly with the MGF on translating country commitments and plans into actions on the ground.

Saroj Kumar Jha

Regional Director, Middle East Department
Middle East and North Africa Region
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Abdullah Jefri

Regional Manager
Levant Countries
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FOREWORD BY THE PARTNER: THE CHAMBER OF COMMERCE, INDUSTRY AND AGRICULTURE IN BEIRUT AND MOUNT LEBANON (CCIA-BML)

As we write this foreword, we cannot help but think about how exceptionally challenging this past year and a half have been for businesses, employees and particularly for women in Lebanon. It is with a strong sense of urgency - but also with much optimism and hope - that CCIA-BML has decided to address challenges to women's participation in the workplace, while aiming to also reverse the recent setbacks that working women in Lebanon have experienced as a result of the COVID19 pandemic, the economic crisis and the Port of Beirut blast.

Even before the crisis, only 23 percent of Lebanon's working-age women were actively participating in the workforce, compared to 76 percent of Lebanon's men. What holds women back in the workplace - here in Lebanon as elsewhere in the world - is widely known. It is among many factors; the burden of domestic care, elderly and childcare, lack of inappropriate transportation, a lack of workplace security and socially constructed stereotypes about the types of jobs and sector women can work and advance in. The ongoing multiple crises have exacerbated some of these challenges for women and is further holding them back or even forcing them out. It is with this understanding that CCIA-BML has decided to work on raising the currently low labor force participation of women in Lebanon. This is so very critical to Lebanon's economic growth path. If Lebanon raised its female labor force participation from currently 26 to 31 percent, as the government has committed itself to in 2019, Lebanon's annual economic growth would be increased by 1.1 points.

We, at the Chamber, know that harnessing the untapped talent pool of the many well-educated women in Lebanon is a critical contributor to boosting the competitiveness and productivity of Lebanese companies and to Lebanon's long-term economic growth. Equally, getting and keeping more women in jobs creates career and income opportunities for them and thereby enhances their agency and decision-making. As such, we at CCIA-BML have joined forces with the International Finance Corporation to regularly convene, engage and thereby build a community of companies that is committed to hiring, retaining, and promoting women.

It is under that initiative that we have launched a series of company insights, that profile Lebanese companies who are committed to advancing women in their company's workforce. The company insights feature three of the chamber's members, that are promoting greater inclusion of women in their workforce in three thematic areas: (1) Supporting women in leadership roles, as Malia Group is doing; (2) Anti-Harassment Policies at the Workplace as Holdal Abou Adal Group and (3) Family Friendly Policies at the Workplace as ITG Group is doing. Our aim is that these company insights will reach many businesses in Lebanon and help them better understand the business benefits of employing women, get insights into the approaches that work, and learn from each other's experiences while replicating solutions.

On behalf of CCIA-BML, we would like to thank the three companies that participated in this project and generously shared their data and good practices. We at the Chamber are committed to continuing our partnership to work with businesses in Lebanon towards creating equal employment opportunities, decent working conditions, and lucrative career paths for women, and we will continue to do more.

Mohamad Nizar Choucair
Chairman, The Chamber of Commerce, Industry and Agriculture of Beirut and Mount-Lebanon[1]

1 The Chamber of Commerce, Industry and Agriculture of Beirut and Mount-Lebanon (CCIA-BML) is a non-profit private organization working for the public benefit. Established in 1887, the CCIA-BML is the main among the four Lebanese Chambers that operate based on Decree Law 67/36 enacted in 1967. The membership roster of the Chamber includes around 15,000 enterprises located in Beirut and Mount Lebanon. The CCIA-BML aims at stimulating economic activity and creating a strong and competitive national economy that is socially inclusive. As such, the Chamber has supported and continues to support the mainstreaming of gender equality by establishing strong partnerships with associations and organizations of the private sector and civil society, especially those working on gender.

The business case for investing in women's employment in Lebanon

HOLDAL Group

Advancing Gender Diversity through Effective Anti-Sexual Harassment Mechanisms

BACKGROUND

Workplace sexual harassment causes immense harm to victims, while also damaging the businesses that they work for. Studies have shown that incidents of harassment may affect the victim's physical and mental health, well-being, dignity, self-esteem, and work situation. In addition, sexual harassment does not make business sense. Violence and harassment can restrict the social and economic potential of employees by causing increased absenteeism, lower productivity, reduced performance, and resignation (ILO, 2020). In reference to the ILO Convention (No. 190), the private sector is increasingly interested in preventing violence and sexual harassment given the harm they cause in terms of higher staff turnover, onboarding and training costs, not to mention a damaged corporate reputation and potential legal costs arising from sexual harassment lawsuits. Violence and harassment affect disproportionally more women. Businesses stand to reap profound benefits from providing a safe, harassment-free workplace. Companies that hire and retain more women enjoy access to a wider talent pool (Harvard Business Review, 2019), lower staff turnover rates (IPRM, 2017), and improved overall staff performance (Sodexo, 2016) – amongst others. In Lebanon, forward-thinking businesses can secure these gains by creating a safe environment to attract in particular more women into the labor force. Although the number of working Lebanese women has increased in recent years to approximately 24 percent of the total labor force (World Bank, 2018), it is still well below the global rate of 47 percent (ILO, 2019).

HOLDAL's employee profile 2021

HOLDAL
ABOU ADAL GROUP

Total Number of Employees: 650

Women comprise:

- 50% of all employees
- 60% of the board of directors
- 21% of executives/senior managers
- 52% of lower middle management
- 45% of lower management

Summary of key initiatives:

- Clear and comprehensive anti-harassment policy
- Robust complaints mechanisms
- Mandatory anti-harassment training for all staff
- Confidential procedures, as far as possible
- aGrievance Policy
- Code of Business Conduct
- Whistle Blow Policy

Summary of business benefits related to anti-harassment measures and safe workplaces:

- Improved work environment
- Improved staff morale and productivity
- Reputational benefits
- Representing their customers and providing an example

Unfortunately, workplace sexual harassment remains a challenge in Lebanon and in neighboring countries. Anecdotal evidence shows that women sometimes face degrading treatment of a sexual nature, but many Lebanese women tend not to raise official complaints about this behavior. For example, an Institute for Women's Studies in the Arab World study found that women who had experienced problems with their employers cited reasons such as exploitation (44%), rude behavior (24%) and gender-based discrimination (16%). The absence of complaints related to sexual harassment can be attributed to cultural barriers such as fear of being doubted, social pressure, and shame. Naturally, this culture of silence imposes serious obstacles for tackling workplace sexual harassment across the country. Women, Business and Law (World Bank, 2021), stresses on the importance of addressing sexual harassment in the workplace is key to achieving fundamental labor market goals, particularly in women's career trajectories.

Despite these challenges, Lebanon has recently taken some tentative yet encouraging steps towards supporting victims of sexual harassment. For many years, progress was tortuously slow towards implementing legal frameworks aimed at stamping out sexual intimidation. Finally, in December 2020, the Lebanese Parliament passed a law criminalizing sexual harassment, *Law No. 205/2020*. The new legislation makes it illegal to commit various kinds of harassment, both in person and online. The law specifically covers employer-employee relationships, which are considered a "relationship of dependency," and provides for increasingly severe penalties against guilty workplace bosses. The law also protects complainants from all forms of retaliation or discrimination based on their reported incident throughout the court process (Human Rights Watch, 2021).

The recent legislative reforms can provide fresh impetus for various efforts to tackle sexual harassment in the community. In August 2017, Lebanon witnessed a popular social media campaign #MeshBasita ("It's not OK") that condemned all forms of sexual harassment – interestingly, the campaign occurred well before the #MeToo movement went viral in Western countries. The #MeshBasita initiative was formulated by the Knowledge Is Power (KIP) Project on Gender and Sexuality at American University of Beirut's Olayan School of Business, in partnership with the Minister of State for Women's Affairs. The campaign highlighted the many forms of harassment that women face every day, including at the workplace. This widespread incident rate reiterates that, although sexual harassment is now criminalized under the 2020 law, private businesses have a crucial role to play in enforcing and monitoring the law's implementation. In this way, the private sector can take leadership and help to pioneer true gender equality in Lebanon.

This company insight explores how Lebanese companies can encourage more women to join the workforce by implementing anti-sexual harassment policies. The example set by HOLDAL Group (HOLDAL) – a third generation family business in Lebanon working in retail, distribution, manufacturing, and supply chain – demonstrates how businesses can create a safe and enabling environment to support more women leaders within an organization. The company insight was compiled based on seven interviews with women (directors, senior, and middle management) and three interviews with men (senior and middle management). The study also included one focus group discussion with six female employees (in entry level positions), while also analyzing HOLDAL's human resources data and company policies. The sample size however is not statistically significant and cannot be used to draw definite conclusions but rather provides anecdotal evidence on the topic of this study.

COMPANY OVERVIEW: HOLDAL GROUP

HOLDAL was founded in 1947 in Lebanon and currently operates in retail, distribution, manufacturing, and supply chain management. HOLDAL specializes in beauty, personal and household care, healthcare, lifestyle and luxury products.

HOLDAL has the following company values, which include integrity, team spirit, leadership and accountability, entrepreneurship and innovation, responsible citizenship.

In January 2018, HOLDAL joined the UN Global Compact (UNGC), which unites companies to take steps towards implementing the UN Sustainable Development Goals.

Why Holdal Group?

The World Bank Group (WBG) had conducted several interviews with leading Lebanese private sector companies that could be the subject of this study. Based on a selected set of criteria such as company policies and availability of quantitative HR data, company gender diversity efforts on relevant topics, previous experience with the WBG in particular the IFC Gender team, size of the company. Holdal Group proved to be a prominent Lebanese private sector company that has made great strides towards gender diversity, in particular advancing gender diversity through effective anti-sexual harassment mechanisms. As such, Holdal Group was selected to be the subject of this company insight.

BUSINESS CONTEXT AND DRIVERS FOR THE DEVELOPMENT OF ANTI-SEXUAL HARASSMENT MECHANISMS

By December 2020, women accounted for 50% of HOLDAL's 650 employees, with 21% of HOLDAL's female employees holding senior management positions.[2] These figures indicate that HOLDAL gender diversity results easily exceed Lebanese standards – a 2019 study by the Lebanese government's Central Administration of Statistics (CAS) revealed that only 24% of the female population was part of the national workforce (CAS, 2019).

HOLDAL management attributes the company's relatively high female labor participation rate (FLPR) to the commitment of HOLDAL's shareholders and leaders to fostering gender equality. Employing women makes strong business sense, especially given that several of the company's major product lines are geared towards female customers. HOLDAL's clients have often expressed to the employees much appreciation of the strong participation of women in the company's labor force, with talented females able to provide a unique and meaningful customer experience.

> **"I would say that the main reason behind initiating the anti-sexual harassment policy is the family behind this business, as they value women's empowerment and gender equality"**
>
> Camille Wazen, General Manager at HOLDAL Group

HOW HOLDAL SUPPORTS A SAFE AND ENABLING WORK ENVIRONMENT?

In 2020, HOLDAL's General Counsel implemented a comprehensive anti-harassment policy, which aligns with the company's commitment to providing a safe work environment for all employees. When designing the policy, HOLDAL engaged collaboratively with staff through a series of scoping and fact-finding activities. Roundtables were conducted with four groups of 35

2 Management positions include the following levels: Director, Senior manager, Manager, Supervisor, Specialist, Senior officer.

employees each – one consisting of men, one of women, and two of mixed genders. Through these roundtables, HOLDAL management learned more about how employees perceive and understand sexual harassment, while also welcoming input and suggestions on the policy. HOLDAL then completed the policy, granted staff access to all new internal documents, and publicized the policy widely. Since then, all current staff and new recruits must attend training workshops on sexual harassment and the company's anti-harassment policy. In addition, HOLDAL's regular yearly awareness sessions with employees on anti-sexual harassment have played a major role in driving open conversations about this topic and encouraging direct feedback from all employees to management. According to HOLDAL's General Counsel, thanks to this whole initiative on anti-sexual harassment, women employees are now encouraged to speak up to management more than before.

HOLDAL has also commissioned an external peer review of the company's anti-harassment policy. At the time of writing, the policy had been reviewed by experts from the American University of Beirut's Center for Inclusive Business and Leadership for Women (AUB-CIBL) team. The AUB-CIBL specialists provided constructive feedback on how to improve and update HOLDAL's anti-harassment policy, ensuring that the guidelines align with global best practice. The current policy comprises the following:

A Clearly Worded Commitment

From the outset, the policy unambiguously states the company's commitment to a secure workplace – free of harassment – where employees can feel safe, protected, respected, and happy. The policy also states that appropriate disciplinary action will be taken against any employee proven to have committed any kind of harassment, be that sexual or otherwise.

Defining Harassment

The policy defines sexual harassment as including verbal, non-verbal and physical harassment. Several examples are offered to ensure clarity, such as jokes of a sexist nature, sexual propositions, distribution of any sexually suggestive material (graphic or written), and any form of staring or unwelcome physical contact. It should be noted, however, that the policy provides examples for illustrative purposes only – the examples provided are not exclusive in determining whether HOLDAL's anti-sexual harassment policy has been violated.

Roles and Accountability

Under the policy, HOLDAL clearly explains that all employees must fully abide by the anti-sexual harassment policy and, where relevant, play a specific, assigned role. Managers and senior staff are responsible for communicating the policy's importance throughout the company and reporting any complaints to the General Counsel and HR departments. This obligation to report complaints extends to witnesses (or "bystanders"), supervisors and managers, while victims themselves are encouraged to lodge complaints through these channels.

When a complaint is made, the HR department is responsible for investigating the case and developing an incident report (including recommended responses). The HR team also offers legal, medical and psychosocial support for the affected employee, as well as regularly checking on that employee's well-being. Finally, the HR department monitors the relevant work environment for six months to ensure that any decisions made in relation to the incident have been implemented.

Already, this hierarchy of responsibility has achieved tangible results. For instance, when a male staff member verbally harassed a female colleague, the victim's department head reported the incident directly to the HR department. This complaint led to the termination of the male employee, who was found guilty of violating the anti-sexual harassment policy.

"An incident once occurred relating to verbal harassment. Following prolonged investigation and upon confirmation of the incident, we took immediate action and terminated the employee's contract. This is how the rest understood that harassment of any form is not to be tolerated in the company."

Camille Wazen, General Manager at HOLDAL Group

Reporting Lines

The policy lays out clear, simple reporting methods and lines for both formal and informal complaints. The document specifies the steps to be taken by all those concerned, including the complainant, bystanders, directors/managers, and the company's HR staff. An informal complaint would be resolved through mediation between the concerned parties, while a formal complaint follows more detailed, in-depth investigations.

Initially, employees should report any witnessed or experienced harassment to the relevant direct manager. In cases where the direct manager is accused of harassment, employees should report to the company's Human Resource Manager or General Counsel. Upon receiving a complaint, the direct manager must raise the case directly with higher management by compiling a detailed incident report. From this point, the Human Resources Manager or General Counsel promptly begins a formal investigation, while also providing support appropriate services to the victim.

Confidentiality

Within the policy, the company states that it will maintain confidentiality over the identities of both the complainant and the alleged harasser, while also keeping all details of the incident secret. This provision ensures that all parties benefit from protection and fair, equal treatment until the matter has been resolved. In addition, HOLDAL undertakes to protect all employees from retaliation relating to a harassment complaint.

Clear Disciplinary Consequences

HOLDAL's anti-sexual harassment policy complies with Lebanese laws, including the recent 2020 legislation N 205. The document states that appropriate disciplinary action will be taken against any employee who violates the policy. Depending on the seriousness of the offense, disciplinary action may include a verbal or written warning, suspension, or termination of employment. In appropriate cases, HOLDAL will assist in filing a criminal complaint against an employee alleged to have committed sexual harassment.

THE BUSINESS BENEFITS OF THE ANTI-SEXUAL HARASSMENT POLICY AT HOLDAL

While HOLDAL only recently implemented the anti-sexual harassment policy and complaints mechanism, employees throughout the company have already provided positive feedback on the policy's early impact.

Improved Work Environment

HOLDAL's senior management believes that, while a comprehensive analysis has not yet taken place, staff has been reassured that the company will take appropriate action if an incident of harassment arises. The initial response from staff was positive and welcoming of the new policy, though HOLDAL's management felt that the company had already provided gender-diverse and welcoming workplace for all staff before the policy's introduction.

"I benefited a lot and I was able to listen for feedback and I also learnt how to report or alert any incident of sexual harassment at my department. The staff benefited; women now are less scared to talk about it [sexual harassment."

Pamela Kassouf, Business Manager (Luxury Goods) at HOLDAL

Improved Staff Morale and Productivity

As a result of the policy's positive reception, female employees have reported in this study's interviews and focus group discussions greater comfort and safety at work. Female employees described HOLDAL's work environment as "much more secure and safe", while noting that "these commitments and policies make employees feel safe and protected; thus one can concentrate solely on work."

"I personally believe that any person that works for a company that implements such a policy [the anti-sexual harassment policy] will definitely make them feel more comfortable and will in turn affect their performance positively."

Tania Aghvorian, Talent Acquisition and Retention Manager | Sustainability Lead Human Resources Department at HOLDAL

Reputational Benefits

HOLDAL's management reports that the company's reputation has benefitted from the anti-sexual harassment policy and the company's determination to secure a workplace free of harassment. Management staff are confident that this enhanced reputation will boost HOLDAL's image and perception, both within the company and the throughout the industry. In addition, HOLDAL management predict that women are more likely to remain at HOLDAL for longer periods of time now that the anti-sexual harassment policy is in place.

"The company's image, reputation, and environment where what initially attracted me the most, but what really keeps me here today is their constant support."

Female employee at HOLDAL

Representing their Customers and Providing an Example

HOLDAL firmly believes that the private sector has a moral obligation to put anti-sexual harassment policies in place. HOLDAL's clients are drawn from every demographic, including women, which provides the company with an even greater impetus to lead change towards a more gender-diverse work force in Lebanon, free from sexual harassment.

"The company benefits by having balanced, relaxed and committed employees. Also, HOLDAL gains a good reputation as [being supportive of women] is one of the most important aspects at the workplace."

Paula Antoun, Business Manager at HOLDAL

LESSONS LEARNED

The first stages in developing HOLDAL's anti-sexual harassment policy included the following key elements:

1. **Values:** The support of the company's owners is vital, and instilling a culture of diversity can significantly improve the chances of success of a newly introduced anti-sexual harassment policy.
2. **Consultations and staff engagement:** It is important to engage with all employees to learn about their perceptions about sexual harassment, related needs, and recommendations for building a safer workplace and thus tailor policies and trainings accordingly.
3. **Awareness Sessions:** Awareness sessions on sexual harassment play a major role in educating staff, particularly new recruits, on the right thing to do when suffering, witnessing, or hearing about a sexual harassment incident.
4. **Possibility for Change:** Private companies with strong leadership can drive change in relation to sexual harassment in Lebanon, despite many persistent obstacles to gender equality until today.
5. **Continuous and Mutual Effort:** An effective anti-sexual harassment policy requires continuous and sustained efforts from all staff members to enforce that policy.

Key Priority Areas for HOLDAL

Moving forward, HOLDAL has prioritized the following action points to foster its safe work environment.

1. Conducting periodic awareness sessions on sexual harassment, specifically targeting new staff members;
2. Producing reports that transparently explain data on the harassment complaints made by workers. The company's internal audit and legal committees will thoroughly review all reports and maintain strict confidentiality over the identities of all persons concerned.
3. Enhancing the complaints process by providing extra training to HR staff on how to conduct workplace sexual harassment investigations.

CONCLUSION

For HOLDAL's management, the creation of an anti-sexual harassment policy was centered around the determination to create a safe, welcoming and inspiring environment for the HOLDAL community. It is HOLDAL's belief that this environment will positively impact their retention rate and increase belongingness and productivity. As such, a safe work environment will lead to fewer incidents of harassment. Productivity has already improved as employees are happier, more engaged and feel safer in the workplace. By implementing such a policy, HOLDAL's leadership hopes that the company will become a corporate role model for how to implement progressive change and to address sexual harassment in the workplace. This is a never ending journey for HOLDAL.

"Create a safe and inspiring environment. This is a part of our core values. We push on diversity and responsible citizenship... We need more purpose and value-driven entrepreneurs and partners who are all conscious of the right collective behavior as a baseline. Respect is at the core of the much-needed unity and trust. "

Maissa Abou Adal, Member of the Board of Directors & Chief Sustainability Officer at HOLDAL

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ANNEX: HOLDAL WORKPLACE SEXUAL HARASSMENT POLICY[3]

1. POLICY BRIEF & PURPOSE

Our sexual harassment policy expresses our commitment to maintain a workplace free of sexual harassment of all types, so our employees can feel safe, protected, and respected.

2. SCOPE

The environment of the company should be characterized by mutual trust and respect and by the absence of all types of sexual harassment.

3. DEFINITION OF SEXUAL HARASSMENT IN THE WORKPLACE

For the purpose of this policy, sexual harassment is defined as any verbal, physical, written, media or other unwelcome conduct of sexual nature that has the effect to violate the body, intimacy or feelings of the victim through the excursion of threat, intimidation or coercion on the employee, or any person working for or on behalf of HOLDAL.

4. TYPES OF SEXUAL HARASSMENT

- Quid Pro Quo: When an act of sexual harassment is committed by a person and the harassed person's response to such acts may implicitly or explicitly affect the decisions related to their employment, promotions or rewards (such as terms of pay, promotion, transfer, renewal of work contract, or the imposition of disciplinary penalties)
- Hostile Work Environment: Acts of a harassment committed by Employees and Clients that may create an intimidating
- Offensive work environment. For instance, when comments, allusions or menaces become part of the work culture or create an unsafe work environment for people who are the object of these comments.

5. FORMS OF SEXUAL HARASSMENT

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes insinuations, suggestive comments, jokes of a sexual nature, sexual propositions, threats or requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse oriented toward a prohibitive form of harassment.
- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes, facsimiles, e-mails, photos, text messages, WhatsApp, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.
- Physical sexual harassment includes staring, unwelcome, unwanted physical contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, and forced sexual intercourse or assault, or other

6. ROLES AND ACCOUNTABILITIES

Employees are responsible for:

- Abiding by the provisions of this Anti-Harassment Policy.
- Reporting any harassment incident witnessed or endured, anywhere and anytime in the company, to direct person in charge and bringing it to the attention of the Human Resources Manager (HRM) or to the General Counsel (GC).

Directors/Managers are responsible for:

- Communicating awareness to all staff that harassment will not be tolerated and promoting a zero tolerance environment.

3 This policy has been updated in October 2021 in collaboration with the American University of Beirut's Center for Inclusive Business and Leadership for Women (AUB-CIBL).

- Spreading info about what is acceptable to prevent any harassment incident.
- Reminding about policy relevance and importance.
- Reporting any harassment incident that happens to the HRM or GC.

HRM is responsible for:

- Policy issuance and review.
- Informing all employees about policy provision, including new comers during induction, via information campaigns where needed in collaboration with marketing (brochures, posters, policy release on intranet), and trainings on proper work environment measures.
- Providing yearly training on sexual harassment.
- Applying fairly and consistently the approved policy including prevention and providing support and service where and when needed.
- Investigating any harassment incident that is reported.
- Preserving and protecting the confidentiality of all the information related to the investigation including the names of the parties concerned (the harasser and the victim), the names of the witnesses, and all information (written or verbal) that may be disclosed during the investigation.
- Providing support to the parties concerned.
- Documenting the case.
- Taking the necessary disciplinary measures if needed.

7. COMPLAINT PROCEDURE

Employees who are facing harassment may choose to resort to either an informal action, informal reporting or a formal reporting, in accordance with the below company's policy.

a. Informal Action:

Employee, who suspects that a harasser does not realize he/she is guilty of harassment, could talk to him/her directly in an effort to resolve the issue. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues.)

Employee may choose as well to discuss the matter with the harasser in an informal manner in the strictest confidence; in the presence of a trusted third party of his/her, choice especially if there is an impression that the harasser is unaware of the discomfort being created. The sooner it is made known, the easier it is to stopping it.

b. Informal Reporting:

- Employee who may be facing any form of harassment and who chose to resort to an informal channel for reporting the incident, thinking that the incident can be settled informally, may address his/her Direct Manager (DM), or the HR Manager (HRM) or the General Counsel (GC).

The HRM or the GC will:

- Invite the victim for an interview and secure protection and fairness.
- Discuss potential ways for addressing the incident with the victim.
- Take the necessary actions to address the incident: inform the harasser of the complaint and explain the company's Anti- sexual Harassment Policy, and provide space for the alleged harasser to share his/her perspective on the incident or facilitate the discussion between both parties and act as a mediator for settling the issue among other actions.
- Maintain confidentiality of both the alleged victim and the alleged harasser's identities, as well as details of the incident.
- Document the case and the achieved outcomes, and file the case in both offender's and victim person's files.
- Follow up on outcomes.
- Protect the victim from any retaliation.
- Monitor the work environment for 6 months to ensure that decisions are implemented and that no side effects/retaliation incurred.

c. Formal Reporting:

Victim employees have the choice of going through a formal reporting channel. A formal complaint requires the filling of a formal notice (Appendix 1) to be submitted to the GC. Once a formal reporting has been filed against the harasser of an incident of harassment and sent to the GC, a formal investigation will take place.

The GC conducting the investigation will:

- Invite the alleged victim of a sexual harassment for an interview and promise protection and fairness during and after investigation.
- Invite the alleged harasser for an interview and promise fairness during and after investigation.
- Explain the company's anti-harassment policy and investigation process to both the alleged victim and the alleged harasser.
- Interview witnesses and have their written deposition and promise protection and fairness during and after investigation.
- Document the incident in writing including date, time, location, etc. and understand the outcomes desired by the victim.
- Assess whether harassment incident did take place and decide on upcoming measures, taking the alleged victim person's requests into consideration in order to empower the alleged victim and alleviate the impact of the incident.
- Develop a report on the incident including recommendations on actions to be taken for addressing the incident, and remedies for the alleged victim.
- Inform in writing both parties of the outcomes of the investigation.
- Maintain confidentiality of all information related to the investigation including the identities of the alleged victim and the alleged harasser's and witnesses.
- A copy of the outcome notification of both parties should be kept in their files.
- Follow up on the implementation on the disciplinary action and recommended remedies
- Protect the victim and all witnesses from any retaliation.
- Monitor the work environment for 6 months to ensure that no retaliation is experienced

When necessary the HRM or the GC may decide to suspend the services of the alleged harasser until the investigation process has been completed.

8. CONFIDENTIALITY

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the victim is usually revealed to the parties involved during the investigation, and the HRM will take adequate steps to ensure that the victim is protected from retaliation and any other measure during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

9. DISCIPLINARY ACTIONS

Sexual harassment is illegal and is sanctioned by the Lebanese criminal code, by the labor law, by the International Labor organization regulations, by the internal regulations of HOLDAL, and by the national anti-harassment law N 205/2020.

Appropriate disciplinary action will be taken against any employee who violates this policy. Depending on the seriousness of the offense, disciplinary action may include verbal or written warning, suspension or termination of employment as per HOLDAL's internal regulations (article 33-9) and/or filing of penal action against the harasser based on Law N 205/2020 and any law in force.

10. COMMITMENT We at HOLDAL,

- *Commit to seriously investigate relevant reports. In addition, in order to encourage the victim to report, the burden of proof will be imputed on the harasser, without compromising any objectivity with regard to the investigation.*
- *Based on our conviction to implement a **Zero Tolerance** policy against harassment, and based on our determination to secure a harassment-free environment, we will not hesitate to terminate any employee proven to have committed Harassment.*

Contact Information

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