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**1 of 6****ANTI-SEXUAL HARASSMENT POLICY****OBJECTIVES**

- To create and maintain a community where all persons who participate in activities and programs of Discovery World Corporation (DWC) can work and learn together in an atmosphere free from all forms of harassment, exploitation and intimidation.
- To make every employee and stakeholder of this community aware that DWC is strongly opposed to any form of sexual harassment and that such behavior is prohibited by law and DWC policy.
- To provide a process for reporting and responding to complaints of sexual harassment in order to prevent, to correct, and if necessary, to discipline any member of the DWC community who violates this policy.

**I. SCOPE**

All members of the DWC community in all activities, programs, project offices/sites, or venues of official functions, or while representing DWC in an official capacity.

**II. POLICIES**

- A. DWC is committed to maintaining a positive learning, working and living environment. DWC will not tolerate any act of sexual harassment or retaliation against any complainant or witness by any member of the DWC community (e.g., employee regardless of status, position, and job rank/level, or any other person who has dealings/transactions with DWC).
- B. DWC's Anti-Sexual Harassment Policy provides a general definition of sexual harassment and retaliation and sets out a procedure to follow when a member of its community believes that a violation of this policy has occurred.
  1. Sexual Harassment consists of interaction between individuals of the same or opposite sex that is characterized by unwelcome sexual advances, requests for sexual favor(s), and other physical or verbal conduct of a sexual nature when:

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- a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, performance evaluation, career development, living conditions or a business transaction.
  - b. Submission to or rejection of such conduct by an individual is used as a basis for tangible employment, educational or business decisions affecting such individual; or
  - c. Such conduct has the purpose or effect of unreasonably interfering with an individual's work or creating an intimidating, hostile or offensive work or learning environment.
2. It is also considered a violation of DWC's Anti-Sexual Harassment Policy to retaliate against a person who reports an alleged incident of sexual harassment or who testifies, assists or participates in any proceeding, investigation or resolution of a sexual harassment report. Retaliation includes, but is not limited to, threats, intimidation, reprisals, and/or any adverse action related to employment, education or a business decision.
  3. Sexual harassment may include incidents between members of the DWC community including officers, associates, seasonal employees, project hires, consultants, or non-employee participants in DWC's activities and programs such as, but not limited to, vendors, contractors, consultants, partners, recipients, patients or guests.
  4. Sexual harassment may occur in hierarchical relationships, between peers, or between persons of the same or opposite sex.
  5. Consensual romantic relationships between members of the DWC community are not subject to this policy. However, while romantic relationships between members of the community may begin as consensual, they may evolve into situations that lead to charges of sexual harassment that will then be subject to this policy.
  6. It is also considered a violation of the Anti-Sexual Harassment Policy for anyone to make a false complaint/report of sexual harassment or to provide false information regarding a complaint/report of sexual harassment.

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7. When an incident of sexual harassment has been referred to the Compliance Office for proper disposition, all concerned parties are enjoined to ensure the confidentiality of the issue and all matters related to the incident and guarantee the utmost respect for individual privacy.
  8. It is intended that individuals who violate this Policy be disciplined or subjected to corrective action, up to and including termination for cause in conjunction with DWC's Code of Conduct.
  9. Any administrative/disciplinary action is not a bar to the filing of a criminal/civil case for acts of sexual harassment.
- C. Any person who directs or induces another to commit any act of sexual harassment as herein defined, or who cooperates in the commission thereof by another without which it would not have been committed shall also be liable under this policy and DWC's Code of Conduct.
- D. The Human Resources Management Office together with the Department Head shall be responsible for disseminating this policy to the community while immediate superiors will be responsible in ensuring that this policy is read and understood by all employees within their respective units and disclosed to third parties who have dealings/transactions with their offices. This policy shall likewise be part of the on-boarding program for new employees.

### **III. PROCEDURE**

- A. An employee who believes that he/she has experienced or witnessed sexual harassment or related retaliation should promptly report such behavior to his/her immediate superior, Department Head, and the Chief Compliance Officer. Any other party who is a victim of sexual harassment may report the incident to the Chief Compliance Officer or any DWC officer who shall, in turn, refer the matter to the Compliance Office.
- B. Any immediate superior who receives a complaint/report of sexual harassment or related retaliation or witnesses such an incident is required to promptly report it to the Compliance Office. Professionals, who due to the nature of their work become privy to such information, are exempted from this provision based solely on the confidentiality of all matters discussed between the doctor/counselor and patient/client.

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- C. Action/investigation of the sexual harassment complaint/report shall start within fifteen (15) days from receipt of complaint or report. The investigation shall be concluded and reports including recommendations submitted to the Department Head within ninety (90) days from receipt of complaint or report.
- D. The Chief Compliance Officer shall be responsible for coordinating and consulting with the Department Head of the complainant/affected party and/or respondent to determine the most appropriate means for addressing the complaint/report based on the procedures of the Code of Conduct. If the complaint is against the employee's immediate supervisor or Department Head, the Chief Compliance Officer shall coordinate and consult with the Department Head.
1. Investigating the complaint/report in accordance with the Code of Conduct;
  2. With the agreement of both parties, attempt to resolve the complaint/report through the form of an alternative dispute resolution process (e.g., mediation);
    - a. The Chief Compliance Officer, in consultation with the Department Head of the complainant may designate another individual from within or outside DWC to conduct or assist in the investigation or to manage the alternative dispute resolution process.
    - b. Anyone so designated must adhere to the provisions of the Company's Anti-Sexual Harassment Policy and must confer with and inform the Director Compliance Office about his/her progress. The designated party must submit a report within the timetables prescribed in this policy.
  3. If it is determined by the Chief Compliance Officer and Department Head that the complaint/report does not constitute sexual harassment, a summary report indicating the findings shall be submitted to the Department Head while the complainant/reporter shall be duly informed of the result of the preliminary investigation.
- E. All complaints or reports shall be made as promptly as feasible after its occurrence. A delay in complaining/reporting a sexual harassment incident may be reasonable under some circumstances on a case-to-case basis. However, an unreasonable delay in complaining about or reporting any alleged sexual harassment incident shall be an appropriate consideration in evaluating the merits of the complaint.

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- F. When an investigation is conducted, both the complainant and respondent shall have the right to:
1. Receive written notice of the complaint/report including a statement of these allegations; and
  2. Present relevant information to the body conducting the investigation.
- G. The Department Head, the respondent's immediate superior shall be notified that an investigation is ongoing. The Chief Compliance Officer shall advise the respondent's Department Head if there is a need to relieve the respondent of any duties and responsibilities or authority during the investigation. If the Department Head declines, he/she shall submit a letter of explanation to the Department Head detailing the reasons with a copy provided to the Chief Compliance Officer.
- H. The investigation shall be conducted by a committee to be constituted by the Chief Compliance Officer in consultation with the Department Head. Whenever practicable, a peer from the same employment classification as the complainant shall be included in the committee.
1. The Investigating Committee shall submit a recommendation to the Department Head.
  2. Disciplinary action shall be imposed if warranted and only after compliance with the requirements of due process.
  3. All records and proceedings shall be considered as confidential.
  4. The complainant and respondent shall be informed of the results of the investigation and the resolution of the complaint/report.

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This Policy shall take effect immediately and shall be made known to all employees.

*Issued by:*

*(Original signed)*

\_\_\_\_\_  
**Anna May B. Nieva**  
Chief Compliance Officer

\_\_\_\_\_  
November 18, 2014

Date

*Approved by:*

*(Original signed)*

\_\_\_\_\_  
**John Y. Tiu, Jr.**  
President

\_\_\_\_\_  
November 18, 2014

Date

Violations of any of the provisions contained in this policy are governed by DWC's Code of Conduct, if applicable.

Discovery World Corporation shall have the sole and exclusive prerogative to add, amend, revise, and/or delete this policy. In the event that there is a need to add, amend, revise, and or delete portions of this policy, the Chief Compliance Officer must first submit to the President its request citing the reasons for the change. If approved, the said change shall be made by DWC.

In the event any portion of this policy is repealed by provision of law, it shall not affect the remaining provisions that are consistent with the law.