Discrimination, Harassment and Bullying Policy

Effective Date	February 24, 2020	**Version**	2.1	**Version Date**	February 24, 2020
Responsible Team	Ethics and Compliance Department				
Supersedes	Discrimination, harassment and bullying sections of Employee Handbooks				
Policy Type	Tier 1			**Policy Number**	N/A

POLICY

1. Purpose

1.1. Prosper Global is committed to a work environment in which everyone is treated with respect and dignity. We strive to maintain a culture of caring, which looks to ensure the emotional and physical safety of our teams and anyone we work with. We strive for a diverse and inclusive working environment and expect that working relationships are based on or built around mutual respect, and are free of bias, prejudice and harassment.

1.2. We will not tolerate discrimination, harassment, or bullying of team members anywhere in the world. This policy sets out Prosper Global's prohibitions against discrimination, harassment, and bullying and the required procedures to ensure Prosper Global upholds its commitment to preventing harassment, discrimination and bullying by and of team members. This policy is intended to ensure that all global team members are held to a common minimum standard and that all allegations of violations and decisions regarding disciplinary measures are handled in as consistent a manner as possible. The policy applies globally without regard to local cultural practices or social norms.

2. Scope and Application

2.1. This Policy applies to Prosper Global (U.S.), Prosper Global (UK), and Prosper Global (NL), including their branches, subsidiaries, and controlled affiliates (together, "**Prosper Global**"); all Board Directors, officers, employees, seconded employees, interns, daily workers, and volunteers (collectively, "**Team Members**"); all subrecipients, partner organizations, contractors, consultants, agents, representatives, and other individuals acting on Prosper Global's behalf or at its direction (collectively, "**Partners**"); and all visitors to Prosper Global facilities or programs, including photographers, filmmakers, journalists, researchers, current and prospective donors, and other hosted guests ("**Visitors**").

2.2. This policy applies to the workplace and to activities outside the workplace on work trips, at work related social events, and to interactions between co-workers in group staff housing

2.3. Prosper Global expects its managers to proactively hold team members accountable to high standards of performance. The purpose of this policy is not intended to limit a manager's ability to manage an individual's performance that is not meeting expectations.

3. Policy Statements

3.1. Prohibited Conduct. Discrimination, harassment and bullying of any kind is inconsistent with Prosper Global's mission. Each team member has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices and any form of unlawful harassment or bullying. Prosper Global will not tolerate negative action against a team member related to his or her membership in a protected group. Any behavior involving discriminating against, harassing, bullying or intimidating anyone filing or considering filing a complaint is prohibited conduct.

3.1.1. **Discrimination** is any negative action or attitude directed toward someone because of his or her membership in or affiliation with a protected group, including: age; disability or medical history; ethnicity, national origin, race, caste or socio-economic status; religion, gender, gender-identity or gender reassignment status, family status, marital status (with the exception of child marriage) or pregnancy, and sexual orientation. The unfair or unequal treatment of an individual (or group) in hiring, assignment, execution of duties, training or development, promotion or any other facet of their employment based on any of the characteristics described above is prohibited. Specific examples of conduct potentially constituting discrimination include, but are not limited to:

- Making a job offer to a woman with a lower wage than what would be offered to a man doing the same job with the same skill level.
- Denying reasonable accommodations due to religious practices or observances.
- Denying reasonable accommodations due to different physical or mental abilities.
- Denying a promotion to an older person, in favor of a younger person because a younger appearance is desired.
- Denying or discouraging time off because the individual is single or doesn't have a family.

3.1.2. **Harassment** is unwanted conduct affecting the dignity of individuals in the workplace based on the characteristics listed in Section 3.1.1. Harassment is conduct perceived as demeaning and unacceptable by the recipient and which creates an intimidating, humiliating or offensive environment. Harassment, as defined in this policy, may be persistent or a single, isolated incident of a serious nature. Harassment can occur in-person, by phone, email, through social media or other electronic communication. Specific examples of conduct constituting harassment include, but are not limited to:

- Making offensive jokes or remarks about or using offensive stereotypes relating to race, gender, sexual orientation, religion, disability or other protected characteristic.
- The presence of written or graphic material that denigrates or shows hostility or aversion toward an individual or group in the workplace including on walls, in vehicles, on electronic equipment, or elsewhere on the agency's premises or circulated in the workplace.
- Making fun of individuals or deprecating them because they are offended by conduct they consider harassing or unwelcome.

For sexual harassment see the Prosper Global Sexual Misconduct in the Workplace Policy.

3.1.3. **Bullying** is intimidating, malicious, or insulting behavior towards a team member, whether or not that behavior is based on membership in a protected group. Bullying often involves abuse or misuse of power, and is intended to undermine, frighten, humiliate, denigrate, injure or cause harm to the recipient in some way. Bullying is generally of an ongoing/pervasive nature but may also be a single incident, and it may be subtle in nature. Bullying can occur in-person, or by phone, email, through social media or other electronic communication. Specific examples of conduct which may constitute bullying include, but are not limited to:

- Verbal aggression such as shouting or swearing.
- Persistent, excessive, unwarranted or unfair criticism.
- Public humiliation, ridicule, taunting or unwanted name calling.
- Constant ignoring of opinions or repeated intentional exclusion in the workplace.
- The spreading of dishonest and/or destructive rumors about a team member or the agency.
- Threats of or actual physical assault.
- Intimidating someone who has filed a complaint or is considering filing a complaint (see also Prosper Global Speak Out! Policy).

3.2. Use of Prosper Global Resources for Discrimination, Harassment or Bullying. Prosper Global prohibits use of Prosper Global's work equipment, including computers, cell phones, office walls, vehicles, and internet access for purposes of viewing, displaying, or disseminating material that is discriminatory, harassing or bullying in nature.

3.3. Reporting Procedures

3.3.1. Everyone has the right and obligation to report misconduct involving discrimination, harassment or bullying. Anyone who witnessed but was not the target of discrimination, harassment or bullying is encouraged to report it in their own right.

3.3.2. Team Members and Visitors are encouraged, but not required, to first report to their supervisor, senior leadership or a Human Resources representative.

3.3.3. Anyone can report allegations per Prosper Global Speak Out! Policy to Prosper Global Integrity Hotline (prosperglobal.org/integrityhotline). The Integrity Hotline will forward Global Human Resources (GHR) related complaints to the GHR team. As appropriate to the complaint and the situation, GHR and Ethics may work together.

3.3.4. Reporting of allegations may be done anonymously, although this may impede the ability of the investigation team to assess the complaint and conduct an investigation if necessary. Prosper Global encourages non-anonymous reporting.

3.3.5. Human Resources and other Team Members, including Supervisors and Country Directors, must ensure that they immediately report such allegations to Global Human Resources.

3.4. Because of the nature and sensitivity of allegations of misconduct involving discrimination, harassment and bullying, Prosper Global treats all reports and allegations with the greatest respect for confidentiality of all individuals involved. Prosper Global will seek to maintain privacy at all times during the response process, consistent with our responsibility to maintain individual and team safety. Only people with a need to know will be provided information, and limited to their role in the response and investigation process. Anyone who has a role as part of the investigation or response team is bound by confidentiality and can be disciplined, up to termination, for violating that confidentiality.

3.4.1. Reports to GHR may be made anonymously; however it may be difficult to investigate anonymous allegations. A complainant may also request to preserve confidentiality. In either case, Prosper Global's ability to conduct an investigation that can hold perpetrators accountable for substantiated allegations can be significantly restricted. To the best of its ability, Prosper Global will work with a complainant to address their concerns around confidentiality in order to allow effective investigations to go forward. Effective and fair investigations typically require confronting the accused with the allegations.

3.5. No Retaliation

3.5.1. Prosper Global will not tolerate any form of retaliation against Team Members, Partners or Visitors who report suspected misconduct in good faith or participate in investigations of this alleged misconduct. The full protections for persons making reports can be found in Prosper Global's Ethics Complaint and Whistleblower Policy. Anyone who has experienced retaliation for reporting or participating in an investigation involving discrimination, harassment or bullying should immediately report to the Ethics Team at prosperglobal.org/integrityhotline.

3.5.2. Prosper Global will not require its Team Members, Partners or Visitors to sign or comply with internal confidentiality agreements or statements that prohibit or otherwise restrict Team Members, Partners, or Visitors from lawfully reporting violations to a designated investigative or law enforcement representative of a department or agency authorized to receive such information.

3.6. Investigating Reports of and Disciplinary Consequences for Prohibited Conduct

3.6.1. Prosper Global takes allegations of harassment, discrimination and bullying seriously and is committed to a fair response to all complaints. Complaints will be addressed and investigated as necessary, in accordance with Prosper Global policy and guidance on reporting and investigating Code of Conduct misconduct.

3.6.2. Substantiated findings of misconduct will result in meaningful and proportional discipline that will depend on the nature and severity of the conduct and whether and how it can be effectively addressed. Violations of this Policy by team members can be grounds for disciplinary action, including termination. Partners who violate this policy are in breach of any contractual agreements and may have their agreements terminated and/or prohibited from working with Prosper Global in the future.

4. Required Procedures

Prosper Global ensures compliance with this policy through appropriate processes and procedures designed to ensure to the extent possible that:

4.1. All potential new Team Members undergo screening designed to ensure that they have not previously engaged in discrimination, harassment, bullying or assault;

4.2. All Team Members are informed and trained on this policy via code of conduct training and all Team Members certify that they have understood this policy and agree to abide by it;

4.3. Where appropriate and when in direct contact with Team Members, consultants, experts, contractors, agents, donor and government representatives and Visitors (including journalists and researchers) are informed of the requirements under this Policy;

4.4. All Prosper Global offices display awareness posters on this policy, including all available reporting mechanisms, translated into the primary language of the office and in conspicuous locations where all Team Members and visitors will see them;

4.5. HR team members, supervisors, and senior leadership receive training in how to identify and appropriately respond to potential misconduct involving discrimination, harassment and bullying;

4.6. Anyone can anonymously (if they choose) report all forms of discrimination, and harassment, bullying and assault to the Prosper Global integrity hotline;

4.7. Human Resources representatives, supervisors and leaders who receive allegations or complaints of violation of this policy must promptly report them to the Global HR.

4.8. Team Members and/or Visitors (as defined above) declared ineligible for rehire or re-engagement due to misconduct involving discrimination, harassment and/or bullying will be prevented from any further opportunity with Prosper Global, whether as an employee, consultant or contractor and, when asked for a reference, Prosper Global will indicate that the individual is ineligible for rehire;

4.9. When required, reports are disclosed to donors and regulators. If reports include allegations of criminal misconduct, they may also be disclosed to law enforcement to ensure the safety and well-being of all parties involved, (see the Ethics Complaint and Whistleblower Policy, (4.4.4) and related guidance); and

4.10. Prosper Global Joint Board Audit and Risk Committee is informed (in a manner consistent with Prosper Global commitment to confidentiality) of all reports and investigations involving physical assault, at or around its regularly scheduled meetings and provided with whatever additional information necessary to allow it to conduct its oversight duties (see the Ethics Complaint and Whistleblower Policy and related guidance).

5. Roles and Responsibilities

5.1. Prosper Global's General Counsel and Ethics Team are responsible for:
- 5.1.1. Ensuring this policy remains up-to-date via bi-annual reviews;
- 5.1.2. Ensuring that any Policy related complaints received by the Integrity Hotline are referred to GHR.

5.2. The Chief People Officer and Human Resources Team are responsible for:
- 5.2.1. Ensuring that safe recruiting processes are in place and adhered to;
- 5.2.2. Ensuring that all Team Members undergo the code of conduct training and acknowledge their understanding of it and willingness to abide by it;
- 5.2.3. Ensuring that all allegations of violations of this policy are addressed in accordance with this policy.
- 5.2.4. Ensuring that team members declared ineligible for rehire are not rehired by Prosper Global and that this status is included in responses to employment verification checks by other organizations.

5.3. All Prosper Global executives, country directors and senior management in all countries and areas where Prosper Global operates are responsible for:
- 5.3.1. Creating and maintaining an environment and culture that fosters respect and inclusion and does not tolerate discrimination, harassment, bullying, or assault;
- 5.3.2. Overseeing the full implementation of this Policy in their area of operations;
- 5.3.3. Ensuring that all allegations of misconduct involving discrimination, harassment, bullying or assault are taken seriously and immediately reported and are treated with confidentiality and given high priority; and
- 5.3.4. Ensuring that Team Members, Partners or Visitors who report allegations or participate in investigations are not retaliated against.

5.4. **Relation to Local Laws.** Prosper Global will comply with laws and regulations prohibiting misconduct, but where this policy exceeds any legal requirements, Prosper Global will adhere to the standards in this policy to the extent allowed by applicable law. This policy may be amended or adapted to comply with local laws only with the approval of Prosper Global Ethics Team and Global Human Resources Team.

6. Policy Governance

RESPONSIBLE TEAM	Ethics and Compliance Department		
POLICY OWNER	General Counsel		
EXECUTIVE SPONSOR	Chief Ethics and Compliance Officer		
POLICY APPROVER	Prosper Global Board	**DATE APPROVED**	February 24, 2020
LAST REVIEWED	February 24, 2020		
NEXT FORMAL REVIEW DATE	February 24, 2022		