

PUBLIC Group International Limited Anti-Discrimination and Harassment Policy

Core to PUBLIC's values is the importance of a happy, productive and healthy working environment. In order to maintain this we believe in promoting a culture of diversity, respect and tolerance and aim to create a welcoming and inclusive environment, free from discrimination, harassment and intimidation for everyone.

In order to support our goal we have created this anti-discrimination and harassment policy to look after all members of within PUBLIC's community, including members of **marginalised groups**.

Marginalised groups include, but are not limited to;

- People from marginalised racial or ethnic groups
- Women and non-binary people
- Sexual minorities including gay, lesbian, trans, bisexual, and asexual people
- People with health conditions or impairments
- Marginalised religious or nonreligious groups
- Persons of an atypical body size
- Parents and caregivers

This policy will also set out the processes through which subjects of discrimination or harassment can raise concerns about behaviours.

Who is covered by this policy

Everyone who is associated and affiliated with PUBLIC is expected adhere to the policy. This includes, but is not limited to;

- PUBLIC's founders
- PUBLIC Group employees
- Contractors, including GovStart mentors
- Advisors
- Interns
- Founders and employees of GovStart companies that come into contact with PUBLIC
- Founders and employees of Portfolio companies that come into contact with PUBLIC

We believe our employees should be treated with respect and dignity at all times, especially within working environments. We therefore encourage the reporting of any instances of harassment or discrimination that you encounter in the course of your work related duties. If you experience harassment from people outside of PUBLIC's employment during your work related duties, such as members of portfolio or GovStart companies, speakers or attendees of events, or during work related meetings with external guests please do report your encounter through the channels outlined in this policy. We will do what is in our power to take appropriate action, which may include verbal warnings, making more senior members

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of the accused's company aware, ending professional relationships or reporting it to the appropriate authorities.

This policy applies to all physical and digital environments related to PUBLIC's businesses, this includes, but is not limited to;

- PUBLIC's offices,
- Conferences (such as the GovTech Summit)
- Work events
- External meetings
- Social outings
- Business Trips
- Away days
- Roundtables
- Networking events
- Social media platforms
- Work related phone calls
- PUBLIC or GovStart slack channels
- Other forms of messaging services

As investors, as well as gatekeepers to the GovStart and other accelerator programmes, we recognise the potential for an unequal power balance (in PUBLIC's favour) between ourselves and companies we are investing or taking onto programmes. PUBLIC employees therefore need to be especially aware of any possible abuses of power that may occur and should take this into account when interacting with people leading or working in our portfolio companies.

PUBLIC may take action against an employee based on information or evidence of their behaviour outside PUBLIC's work environment if, in our judgement, there is an unacceptable risk to PUBLIC's community from that person.

What is discrimination and harassment?

Discrimination is the unfair or unequal treatment of a person or group of people, especially when due to their status as a marginalised group. Harassment is unwanted and unwelcome comments, behaviours, gestures or actions that make someone feel uncomfortable. Harassment and discrimination are usually repeated and deliberate actions that are known to cause offence. One-off incidents need to be taken in context and may be considered as a misguided mistake, however they also can be considered an offence. All employees should make themselves aware of the policy guidelines and prompt against and/or report incidents of discrimination and harassment.

Discriminatory behaviour includes, but is not limited to:

- Excluding potential employees during recruitment based on their status as a marginalised group member

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- Excluding potential companies from GovStart or investment due to their founders or employee's status as a marginalised group member
- Paying equally-qualified, equally performing and equally tenured employees in the same position different salaries
- Denying certain employees compensation or benefits due to their status as a marginalised group member
- Discriminating when assigning holiday leave, sick leave, disability leave, maternity leave, or retirement options
- Discrimination when promoting or reprimanding employees
- Discrimination against pregnant women or mothers
- Limiting work opportunities for individuals due to their membership of a marginalised group.
- Limiting career progression and development of individuals due to their membership of a marginalised group
- Negative comments about body size, shape, skin colour, physical features
- Discriminatory comments against members of marginalised groups, including negative generalisations or stereotypes of persons of particular religion, country, ethnic group, creed of people, sex, gender, sexual orientation, disability or age.
- Profiling people based on their race, religion, ethnicity etc

Harassment includes, but is not limited to:

- Slurs, comments, jokes, statements, remarks, questions or gestures that are derogatory or demeaning to persons of a marginalised group. Such as;
 - Racial, ethnic, regional or religious slurs
 - Misogynistic comments or jokes
 - Homophobic or transphobic comments
 - Uncomfortable remarks about weight or appearance
 - Offensive statements about someone's age or family situation
- Disparaging remarks about marginalised groups
- Deliberate misgendering colleagues
- Visual displays, such as photos, cartoons etc, of suggestive or degrading images or stereotypes of any individual or group
- Hostile or violent acts towards an employee due to their membership of a marginalised group

Sexual Harassment

Sexual harassment is tormenting, oppressing, subjugating, coercing or assaulting someone in a sexual manner. It includes any unwanted, unwelcome or uninvited conduct of a sexual nature, which makes the recipient feel uncomfortable, intimidated, humiliated or offended. Sexual harassment includes a range of different actions from discrimination on the basis of gender, comments with sexual undertones to physical violence. Sexual harassment can be

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repeated and ongoing, but can also be a one time offence. Examples of sexual harassment, include, but are not limited to:

- Creating a sexualised environment in the workplace
- Unwelcome sexual jokes, language, comments, epithets, metaphors, pranks, gestures, advances or propositions
- Written or verbal abuse of a sexual nature
- Making comments or enquiries about your own, or someone else's, sexual attractiveness or activity, regardless of whether it is intended to be a compliment
- Using sexually degrading or vulgar words to describe someone
- Unsolicited comments about someone's physical appearance, self-presentation or body which may make people uncomfortable
- The display of sexually suggestive objects, images, pictures, posters or cartoons
- Viewing or discussing sexually explicit content
- Making sexual comments in person or via other forms of communication such as, phone call, text, whatsapp, slack, email
- Implying sexual availability
- Sexually themed gifts
- Leering, staring, whistling, or obscene / suggestive gestures.
- Unwelcome physical contact which is considered inappropriate for a business relationship such as unnecessary touching of co-workers, brushing deliberately against the body of co-workers, caressing coworkers face, stroking co-workers legs
- Continually persisting in unwelcome flirtations or physical contact when the behaviour or interest has not been reciprocated
- Sexual activity or coercion under pressure or threat, for a reward or in a context where it is difficult for the recipient to say no. This includes but is not limited to:
 - Non-consensual sexual activity or engagement of any kind, including with people you know or suspect to be forced, threatened, mentally impaired, coerced, unconscious or unable to say no for whatever reason.
 - Demanding, asking or suggesting sexual favors in exchange for positive reviews, interesting assignments, promotions, continued employment, future employment, funding opportunities, access to the GovStart programme or any other programme or challenge PUBLIC are running, access to events or speakers or any promises of the same.
 - Retaliating, threatening to retaliate, or implying retaliation against someone for refusing sexual advances or reporting sexual harassment, For example, defaming, firing, withholding promotion, blocking interviews, giving negative reviews, blocking access to programmes or blocking funding.
 - Threatening someone to gain a sexual favour
- Not allowing someone to leave a space, such as a room, their desk, a car etc
- Engaging in sexual activity when you know that other non-consenting people can see or clearly hear it
- Harassing and stalking, this includes but is not limited to:

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- Seeking out colleagues in a private or personal space without expressed consent (e.g. turning up at their home uninvited, turning up at their hotel room uninvited)
 - Seeking out and contacting people through their private communication channels without their invitation (e.g. unwelcome interactions on social media etc)
 - Seeking out and / or publishing private information without consent, such as address, family names, email etc
 - Following, leering, pursuing people without consent
 - Visually intimidating someone
 - Recording someone, either through sound, video or photography, to intimidate or make them feel surveilled
 - Repeated (rejected) requests for dates
 - Encouraging or enabling others to stalk or harass
 - Continued contact after requests to stop contact
- Physical sexual assault, including but not limited to:
 - Unwanted touching
 - Physical or threatening restraint
 - Physically trapping or pinning someone in a space in a threatening manner
 - Physical violence, threats of physical violence, or incitement of physical violence
 - Sexual assault or rape

Consensual sexual relationships

We are aware that on some occasions colleagues may enter into consensual romantic or sexual relationships. In order to minimise abuse, maximise fairness and mitigate conflicts of interests, if this does occur both parties must notify PUBLIC's operations team. The operations team will then review the situation, and if necessary alter reporting structures, for example if one member of the relationship holds a supervisory capacity to the other, or are part of their reporting framework. We request those who are in an intra-office consensual relationship to keep personal issues, discussion and arguments outside of the workplace, to refrain from public displays of affection within the workplace that may make co-workers uncomfortable and to maintain professionalism and make sure their relationship does not disrupt the workplace.

Other forms of unacceptable behaviour

- Advocating for or supporting any unacceptable behaviour as discussed
- Witnessing any of the above behaviour and ignoring it
- Covering up for any proprietor of unacceptable behaviour
- Minimising, excusing or defending any unacceptable behaviour, for example, victim blaming, claiming generational or cultural differences.
- Prioritising the comfort and enjoyment of certain persons over the safety of a marginal group or individual

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- Criticising targets of oppression for having an inappropriate response to an unacceptable behaviour (tonal policing)
- Coercing, threatening or rewarding people for not reporting violations of the policy

Reporting and enforcement

We encourage anyone who experiences or witnesses any form of discrimination or harassment to report the incident through either informal or formal channels. We will take seriously all complaints made, ensure utmost confidentiality for the individual who comes forward, and ensure they will not be retaliated against. Those who do come forward with complaints will be provided with options for next steps and the potential results of each option. We would like to reinforce that that onus of reporting should not just fall on those who are subjected to harassment or discrimination. In order to create a cohesive and kind work culture in which all employees feel safe, it is important that bystanders also too report any encounters they may witness, whether accidental or otherwise.

In some cases of discrimination or harassment, it may be reasonable for the subject or the witness of the abuse to inform the offender directly that their behaviour is unwelcome and unacceptable and ask that it stops, prior to seeking further methods of reporting. This however is up to individual's comfort level in confronting the perpetrator. Furthermore we understand that in some cases, such requests may not be sufficient to stop the behaviour. In such cases, the informal process may be a good option.

Informal process

An individual may seek to discuss matters of harassment or discrimination in a more informal process, rather than file a formal complaint against the alleged offender and instigate a formal investigation. In such cases:

- The individual is encouraged to reach out and discuss the account with:
 - Their supervisor or line manager
 - A member of the operations team
 - A member of the management team
- The individual may request that the supervisor/ member of the ops team / member of the management team may speak to the alleged offender
- While the individual is not making a formal complaint of harassment, a record of the alleged complaint will be noted and passed on to the operations department, apart from in special circumstances
- In most cases, no formal process will be initiated and no action will be taken against the alleged offender. However the operations team in some circumstances may commence further action if they believe it necessary e.g. If the situation seems imminently dangerous or if there are numerous reports against a person.

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- Please note: The exact course of action will be contextually dependant. Thus to ensure the safest and most robust process, the procedure for the informal process will remain flexible.

Formal Process

If an individual believes they have been harassed or discriminated against, or believes they have witnessed such abuse, they are able to file a official complaint which will be formally investigated. In such cases:

- The individual should reach out to either:
 - Their supervisor/ line manager
 - The operations team
 - A member of the management team
 - File an anonymous report via the electronic platform found in the employee handbook
- The operations team will respond to such a complaint within two days, however in most cases it will be a faster response rate.
- Please note, all formal complaints will trigger mandatory investigations by the operations team. Investigations may include interviews with the parties involved or possible witnesses.
- The operations team will create a detailed and thorough report on the accused violations.
- If the offender is found having violated this policy, PUBLIC will take immediate responsive action. This may include, but is not limited to:
 - A verbal or written warning
 - Anti-Harassment / Anti-Discrimination training
 - Reassignment within the team
 - Banning from certain PUBLIC offices and events
 - Demotion / withholding a bonus
 - Termination of employment
 - Reporting the perpetrator to the relevant authorities
- If a party to the complaint is unhappy with the resolution, they may discuss the possibility of appeal to the operations team which may result in third-party arbitration.