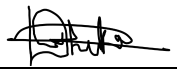
Policy Name	Anti-Discrimination and Anti-Harassment Policy	Version #	2.3
Owner	*Global HR Business Partner*	**Number of pages**	7
Approver	*Global Director, Human Resources*	**Effective date**	25-Mar-26
Division & Department	*Human Resources*	**Date of previous version**	15-Aug-24
Training Required	Yes	**Date of last review**	25-Mar-26
Signature		**Date for next review**	25-Mar-27

I. Purpose

Pathfinder is committed to maintaining a working environment that is free from discrimination and sexual harassment as well as all other types of discriminatory harassment. It is our goal to provide equal employment opportunities for all employees and to prevent any unlawful discrimination or harassment of any individual working at or with Pathfinder.

Pathfinder is an international organization operating in many different countries and legal jurisdictions, and Pathfinder's employees are citizens of many countries. As a result, our operations are subject to many different laws, customs, and cultures. Our operations must comply with all applicable local laws and regulations in addition to the Anti-Discrimination and Anti-Harassment Policy. In some instances, the laws of two or more countries may conflict, or a local law may conflict with the Anti-Discrimination and Anti-Harassment Policy. When you encounter a conflict, contact Human Resources for guidance on how the Anti-Discrimination and Anti-Harassment Policy applies in your country.

II. Applicability

This policy applies to the directors, officers, employees, volunteers, independent contractors, consultants, sub-awardees, and anyone acting on behalf of Pathfinder ("Pathfinder representatives"). This policy applies in the workplace, any work-related setting, including any remote work locations, in communications and materials, and may also apply to information posted by employees on the internet and/or through social networking sites. Please refer to Pathfinder's Social Media policy for further information.

III. Responsibilities

Employees and other Pathfinder representatives shall not harass or discriminate against others. If you believe that you have experienced or witnessed discrimination, sexual harassment or any other kind of discriminatory harassment, you must report the incident immediately through any of the reporting options described in the **Reporting and Whistleblower Protection Policy**.

As detailed in the **Conflict of Interest Policy**, Pathfinder employees are required to disclose certain personal relationships, including significant personal relationships with another Pathfinder. Please refer to Pathfinder's **Conflict of Interest Policy** for further information.

Supervisors should be readily available to discuss any concerns an employee might bring to their attention and to provide information about our policy on harassment and our Reporting Policy, mentioned above. Supervisors who receive reports will take immediate and appropriate action and report the matter in accordance with the Reporting Policy. It is important to note any supervisors or employees who knowingly tolerate any discrimination or harassment, and fail to report such behaviors or incidents, are in direct violation of this Policy and the Reporting Policy and may be subject to disciplinary action.

Human Resources is available to discuss any concerns supervisors or employees have and will provide information about our policy on harassment, our **Reporting Policy** and our **Investigation Policy**. Country HR Focal Points and/or Global HR Business Partners should be readily available to supervisors who receive reports of any violations and will take immediate and appropriate action and report the incident or behavior in accordance with our **Reporting Policy**. If it is determined that an investigation is necessary, one will be undertaken in accordance with Pathfinder's **Investigation Policy**.

Reports are handled and investigations are conducted on a confidential basis, as described in the Reporting Policy and Investigation Policy

IV. Policy Statement

Pathfinder will not accept or tolerate any discrimination or harassment, of, by, or among employees,

other Pathfinder representatives, clients, suppliers or visitors based upon the following characteristics:

> gender/sex (including pregnancy), gender identity/expression, race, color, religion or religious creed, sexual orientation, national origin, ancestry, disability or handicap, age, genetics, marital status, veteran status, military obligations, and any other category protected by law.

Discrimination and/or harassment on any of these bases violates the spirit of equal opportunity, the rights of the individual, and Pathfinder's commitment to, and core values regarding, equal opportunity for all. If you believe that you have experienced or witnessed discrimination, sexual harassment or any other kind of discriminatory harassment, you must report the incident immediately through any of the reporting options described in the **Reporting and Whistleblower Protection Policy**.

Because Pathfinder takes allegations of discrimination and harassment seriously, we will respond promptly to complaints of discrimination and harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of discrimination and harassment, the policy is not designed or intended to limit our authority to

discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of discrimination or sexual or other harassment.

For further definitions of discrimination, harassment, or sexual harassment, please refer to the **Definitions** section of this policy.

IV-1. Prohibition Against Discrimination

Pathfinder is an equal opportunity employer and provides equal opportunity in all our employment practices to all qualified applicants and employees without regard to the characteristics outlined in this policy. Discrimination by any Pathfinder employee or other Pathfinder representative in any aspect of the employment relationship, particularly (but not only) if through purposeful or intentional negative treatment or harassment on the basis of the above-mentioned categories, will not be tolerated and may lead to disciplinary action up to and including termination. This Policy applies to all aspects of the employment relationship, including but not limited to recruitment, hiring, compensation, promotion, transfer, disciplinary action, layoff, training, and social and recreational programs. Any employee or other person with concerns about workplace discrimination of any kind should follow the **Reporting Policy**.

IV-2. Prohibition of Harassment

Harassment covers a range of behaviors, including subtle and not-so-subtle, unwelcome verbal and non-verbal behavior. It can be engaged in or experienced by any individual and by persons in any of the protected groups listed above. Harassment will not be tolerated in any form or at any time by any Pathfinder representative. Harassment is defined in the **Definitions** section below.

Specifically, it is against Pathfinder policy for any employee or other Pathfinder representative to engage in verbal or physical conduct that negatively treats or shows hostility towards an individual because of the characteristics named above and that: (1) has the purpose or effect of creating an intimidating, hostile or offensive working environment; (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities. Examples of circumstances that may constitute harassment are provided in the Definition section of this policy.

Sexual Harassment in employment is unlawful and will not be tolerated by Pathfinder. Pathfinder's Policy against sexual harassment prohibits sexual advances or requests for sexual favors from an employee or other Pathfinder representative, or engaging in any other physical or verbal conduct of a sexual nature when (1) submission to such conduct is made an express or implicit condition of employment; (2) submission to or rejection of such conduct is used as a basis for employment decisions affecting the individual who submits to or rejects such conduct; or (3) such conduct has the purpose or effect of interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment. In addition, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to workers of any gender or gender identity may also constitute sexual harassment. Examples of circumstances that may constitute sexual harassment are provided in the **Definitions** section of this policy.

IV-3. Disciplinary Action

If Pathfinder determines that discrimination and/or harassment has occurred, it will take action appropriate to the circumstances to end the discrimination and/or harassment so that it is not repeated. Steps Pathfinder may take include, among others, warnings, transfers, suspension, counseling, probation and termination.

IV-4. Prohibition Against Retaliation

It is unlawful and against Pathfinder policy to retaliate against an employee or other person for filing a complaint of discrimination (including sexual harassment or other discriminatory harassment) or for cooperating in an investigation of a complaint of discrimination or discriminatory harassment (see the **Reporting and Whistleblower Protection Policy**). Employees who report violations of this Policy, and employees who cooperate in investigations into alleged violations of this Policy, will not be retaliated against in any way.

Even if no violation is found after an investigation, no action will be taken against any employee making a good faith report of a suspected violation of this Policy.

IV-5. Disability Accommodations

Pathfinder is committed to complying fully with all federal, state, and local disability laws and providing equal opportunity in employment for qualified persons with disabilities. Employment practices and activities are conducted on a non-discriminatory basis, including the job application procedure, the hiring or termination of employees, employee compensation, advancement, job training, and other terms, conditions, or privileges of employment.

Pathfinder will endeavor to provide reasonable accommodations requested by all employees with disabilities who are otherwise able to perform the essential functions of their job. An employee seeking accommodation should contact Human Resources.

A reasonable accommodation may include any action which enables a qualified individual with a disability to perform the essential functions of his or her position, but which does not result in an undue hardship to Pathfinder or pose a threat to the health and safety of the employee or coworkers. Pathfinder will engage in an interactive process with the employee and determine the feasibility of the requested accommodation, considering various factors, including but not limited to, whether the accommodation is effective, the nature and cost of

the accommodation, the availability of outside resources, the overall financial resources of the organization and the accommodation's impact on Pathfinder's operations.

Pathfinder may require that the individual requesting the accommodation provide adequate medical certification and a job-related functional assessment. It may, under certain circumstances, request and finance an independent medical examination. Also, in some instances, Pathfinder may not approve the accommodation requested by the employee but may provide an alternate accommodation.

The employee will be informed of the decision on the accommodation request by Human Resources.

Generally, all information pertaining to an individual's disability will be maintained in a separate file marked "Confidential." Consistent with this policy, anyone found to be engaging in any type of unlawful disability discrimination will be subject to disciplinary action, up to and including termination.

V. References

Pathfinder International global policies:

- Reporting and Whistleblower Protection Policy
- Investigation Policy
- Conflict of Interest Policy

US State and Federal Remedies:

In addition to the above complaint reporting procedure, if you believe you have been subjected to discrimination or discriminatory harassment, you may file a formal complaint with the local state and/or federal administrative agency. Note that in most cases, the following Agencies have deadlines for filing complaints of 300 days from the last date of discrimination alleged.

Washington DC Complaints

Complaints to the EEOC must be filed within 300 days. Complaints to the DC Office of Human Rights ("DCOHR") must be filed within one year. An employee making a complaint only under the **DC Human Rights Act** may also file a lawsuit in DC Superior Court without filing within the DCOHR.

EEOC
Washington Field Office
1400 L Street NW, Suite 200
Washington, DC 2000
(202) 275-7377/(800) 669-4000
TTY: (202) 275-7518 / (800) 669-6820
FAX: (202 275-6834
www.eeoc.gov

DC Office of Human Rights (DCOHR)

441 4th Street NQ Suite 570 North
Washington, DC 20001
(202) 727-4559
www.ohr.dc.gov

U.S. Veterans and Individual with Disabilities. Pathfinder shall abide by the requirements of 41 CFR 60---300.5(a) for veterans and 41 CFR 60-741.5(a) for individuals with disabilities. This Regulation prohibits discrimination against qualified protected veterans and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans and individuals with disabilities.

Global Locations:
Contact your local Human Resources Department

VI. Definitions

Harassment: While it is impossible to list every circumstance that might constitute discriminatory harassment, examples of discriminatorily harassing conduct may, depending on the circumstances, include: epithets, slurs, negative stereotyping or threatening, bullying, stalking, intimidating or hostile acts, negative written or graphic material that shows hostility towards an individual or group named above that occurs in the workplace, is circulated in the workplace, or placed anywhere in the Organization's premises such as on an employee's desk or workspace or on Pathfinder equipment or bulletin boards. Additionally, harassment includes any conduct that causes the victim to fear for his or her safety or the safety of a family member or would cause a reasonable person in a similar situation to fear for his or her safety including through technology and social media.

Sexual Harassment: While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness: explicit sexual propositions; sexual innuendoes; suggestive comments; discussion of one's sexual activities; inquiries into one's sexual experiences; sexually oriented teasing; jokes about gender-specific traits; comments about individuals' bodies; foul or obscene language or gestures; displays of foul or obscene printed, audio, or visual material; and physical contact, such as petting, pinching, or brushing against another's body, or any other behavior which creates an offensive or hostile environment.

Discrimination: is treating a person unfairly or in any inferior respect in the workplace because of who they are or because they possess certain characteristics. While it is not possible to list all those circumstances that may constitute discrimination or negative treatment, treating employees unfairly for the following reasons is considered illegal: due to a person's gender/sex (including pregnancy), gender identity/expression, race, color, religion or religious creed, sexual orientation, national origin, ancestry, disability or handicap, age, genetics, marital status, veteran status, military obligations, and any other category protected by law.

VII. Training Requirements

All Pathfinders must complete Annual Anti-Discrimination and Anti-Harassment Training as a condition of continued employment.

VIII. Change Log

Date	Version #	Description of Change	Purpose
September 1, 2025	2.3	Updated titles of accountable parties	Reflect Restructuring and Policy Ownership Changes
September 1, 2024	2.2	Format Modification and Responsibility Updates	Organizational Consistency and Reflect Restructuring and Policy Ownership Changes
September 1, 2020	2.1	Restatement	
April 1, 2018	1.0	Initial Publication	