

Summary Statement

Preventing Sexual Exploitation, Abuse, and Harassment

ALIGHT – Policy

Alight is committed to safeguarding and preventing Sexual Exploitation, Abuse and Harassment (PSEAH) and improving standards, and best practices in relation to PSEAH. This policy is informed by our approach aiming to create meaningful change in people's lives anyone and anywhere, and for this reason this policy applies to our personnel and our communities across the globe. Alight commits to providing assistance, and protection to survivors/victims, whenever possible and needed.

Through this policy, we aim to create a safe environment for all our stakeholders and to send a message that:

we have a zero-tolerance policy towards SEAH of any kind, as such any sexual misconduct and/or retaliation of any kind will result in termination of employment and/or contract.

Alight expects all its personnel, including permanent and seasonal employees, contractors, consultants, volunteers, and members of the board of directors, in addition to its partners and stakeholders- all of whom have a duty to prevent and report incidents of SEAH. This policy applies to all of Alight's operations, country, site, and project offices globally.

Definitions of Misconduct

This policy deals with the following types of misconduct:

Sexual Exploitation is any actual or attempted abuse or exploitation for sexual purposes perpetrated against people in weak or vulnerable positions within hierarchies of power. This vulnerability may be due to a range of differences, including social, political, economic, emotional, and cognitive power and ability. Sexual exploitation can include:

- Rape,
- Sexual assault,
- Requesting sexual services and/or favours in exchange for money, aid and/or assistance,
- Sex trafficking,
- Child abuse.

Sexual Abuse is the intentional violation or attempt to violate the personal space of a person or group of persons in a sexual manner through force, coercion, violence, threats, or intimidation. Sexual abuse includes, but is not limited to:

- Non-consensual touching and/or sexual activity,

- Forced penetration of the vagina, anus, or mouth,
- Non-consensual sexual activity under the influence of drugs and/or alcohol,
- Sexual torture,
- Non-consensual forced touching or stroking the aggressor's genitalia and/or body.

Sexual Harassment is any verbal and/or physical abusive and unwanted practice, action, or behaviour of a sexual nature to which a person or group of persons is exposed directly or indirectly. This can include, but is not limited to:

- Sharing photos, videos, or recordings of a sexual nature, or any form of pornography without consent,
- Sexual comments, jokes, and questions,
- Touching with sexual intentions,
- Sexual insinuations and gestures, such as winking or prolonged staring,
- Certain physical movements that contain sexual innuendos, such as biting lips, whistling, touching one's own genitalia, etc.
- Gift-giving with the aim of establishing sexual relations,
- Unwanted flirtation.

Duty to Report

Alight personnel have a duty to report violations of this policy. There are two types of mandatory reporting:

SEAH Incidents: Personnel must report incidents or suspected incidents of SEAH within 48 hours, but Alight remains open to reporting beyond this period. Reporting is mandatory for all personnel, and failure to report will be dealt with on a case-by-case basis, some might result in penalties and others may result in mandatory trainings and orientations on the policies and procedures and/or termination of employment and/or contract.

Policy Violations: Alight encourages personnel to report violations of PSEAH minimum standards and encourages reporting of any policy non-compliance and/or suspected non-compliance. This reporting must take place within a week of becoming aware of non-compliance. Failure to report will be dealt with on a case-by-case basis, some might result in penalties and others may result in mandatory trainings and orientations on the policies and procedures.

How to Report

Alight provides various reporting channels to its personnel to ensure accessibility. Details are available at country-specific teams and reporting channels. We encourage the use reporting platform known as [AlightSafeSpace](#) that provides two options of reporting: you can submit a report via the [online issue intake form](#), OR you can speak confidentially and directly to an agent by calling the toll-free hotline at **1-800-461-9330**. In both cases you can opt to report anonymously OR you may choose to share your details. In either case rest assured that Alight treats all incidents and reports seriously and with a high level of confidentiality and commits to promptly investigate all allegations or reports.

Alight's PSEAH committee will assess whether the case amounts to a crime in the country where it occurred. If it amounts to a crime, Alight will refer the matter to national authorities.

Assurance and Compliance

Violations of the policy by personnel or partners will be liable to disciplinary action and/or termination of contracts and agreements. Partners, contractors, and service providers are expected to comply with this policy.

I have read and/or someone has read the PSEAH policy summary statement to me. I confirm that I understand the contents of this policy and that I am responsible for complying with its provisions.

Name (Print):.....Signature:.....Date:.....