



## CODE OF CONDUCT - HARASSMENT POLICY

### Event : Insurance Innovation Hackathon 2022

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#### 1. INTRODUCTION

FortNynja is an advocate and champions projects that share our values in building a sustainable and robust cybersecurity ecosystem. Our objective is based on the three pillars - Inclusivity, Diversity, and Sustainability. FortNynja is fully committed to creating a safe and comfortable environment for creative synergy through this journey.

We value our People! The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our people invest in their work represents a significant part of not only our culture, but our reputation and company's achievement.

This Harassment Policy is written and developed by FortNynja, which aims to:

- (a) Prevent any form of harassment within the FortNynja's Events and provide an effective mechanism to eliminate such harassment; and
- (b) Educate all persons involved in recognising harassment is a demeaning practice that constitutes a profound affront to the dignity of persons.

If at any time during your involvement with us that you have questions or comments about this Policy or any related matters to it, kindly contact the FortNynja Team at [info@fortnynja.com](mailto:info@fortnynja.com).

#### 2. SCOPE

This Policy extends to anyone inside or outside of FortNynja, including but not limited to sponsors, company personnel, program or event participants, mentors, partners, contractors, vendors, clients, judges, volunteers, and general community - members of FortNynja regardless of gender, seniority, sexual orientation, level, function, status, or other protected characteristics.

#### 3. DEFINITION OF "HARASSMENT"

Harassing conduct may be verbal (including oral, electronic, or written communications), physical, or visual, and includes, but is not limited to, derogatory comments, unwelcome and/or inappropriate jokes, posters, objects, inappropriate language, written communication including email messages, gestures, physical conduct, assault, battery, and/or unwelcome sexual or romantic advances that creates a hostile or offensive working environment.

## **CODE OF CONDUCT - HARASSMENT POLICY**

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Harassment may be motivated by one of these grounds: race or ethnicity; skin colour; religion; sex or gender; place of origin; ancestry; culture; age; mental or physical disability; sexual orientation; family, marital or social status; economic or financial background; and political affiliation. In particular, this Policy identifies and seeks to eliminate the following types of harassment:

(a) Racial harassment

Harassment in this environment on the basis of race is intended to cause, or has the effect of causing, physical, mental or emotional distress. It is also a form of discrimination.

(b) Sexual harassment

Such harassment refers to conduct or behaviour that is of a sexual nature, and includes such things as a request for sexual favours.

(c) Hostile environment

This is when a victim is subjected to unwelcome and severe or pervasive repeated comments, innuendos, or other conduct, either in a sexual or non-sexual nature which creates an intimidating or offensive place.

(d) Abuse of authority

Abuse of authority happens when a person uses his/her authority to interfere with someone by way of humiliation, intimidation, threats, and coercion.

Although not exhaustive, the following conduct or behaviour would constitute harassment:

- (i) Insulting behaviour or obscene comments (verbal or written);
- (ii) Verbal, written, or physical abuse, threats, and assaults;
- (iii) Derogatory remarks, slurs, epithets, or language;
- (iv) Unacceptable, annoying, or unwanted nicknames or negative stereotyping;
- (v) Racist, pornographic, or otherwise offensive signs, images, pictures, or materials displayed;
- (vi) Threatening, coercion, stalking, spamming, unwelcome demands, intimidating someone, inviting or requesting someone to engage in acts of a sexual nature;
- (vii) Lewd, leering, obscene, or suggestive gestures;
- (viii) Derogatory or offensive pranks and practical jokes;
- (ix) Isolation or exclusion of a person from others;
- (x) Bullying and victimisation, for example, unreasonable and persistent criticism or humiliation, unreasonable distribution of work and responsibilities;
- (xi) Retaliation for reporting harassment or threatening to report harassment;
- (xii) Inappropriate inquiries or comments about a person's sex life, religious or cultural norms, sexual orientation, family background, source of income or lifestyle; and



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### Event : Insurance Innovation Hackathon 2022

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(xiii) Any sort of unwanted solicitation that can be regarded as offensive and undesirable.

#### **4. REPORTING HARASSMENT**

The person(s) who has been directly harassed, or has witnessed or is experiencing or affected by harassment of others, should immediately make a report to the FortNynja Team via the email: [info@fortnynja.com](mailto:info@fortnynja.com). Your complaint should be as thorough as possible and include the names of any potential witnesses and details of the incident (e.g., time, date, location etc), where possible, include evidence or any corroborative information to support the allegation. Anonymous complaints will not be investigated.

Allegations of harassment will be treated seriously and due regard to the need for confidentiality will be given. FortNynja aims to resolve any complaints as quickly as possible. Under no circumstances shall the person alleging the harassment be required to file a complaint with the person responsible for the alleged harassment.

The right to raise at any time the issue of harassment by way of complaint or as witness in an investigation should be exercised without fear of reprisal. FortNynja prohibits any form of retaliation against any persons.

While FortNynja has a zero-tolerance position on harassment, if the person needs help in determining whether the harassment has occurred, or whether to take an informal approach, he/she should seek advice from the FortNynja Team.

Alternatively, any person who is experiencing or affected by harassment may take an informal approach, if he/she considers appropriate, in resolving the problem by raising the matter directly with the person responsible (the "alleged harasser"). It is possible that the alleged harasser may not realise that this behaviour is unwelcome or offensive.

The person who is affected may make an initial attempt to make it clearly known to the alleged harasser that his/her behaviour is contrary to this Policy and that he/she should stop behaving in this manner.

#### **5. INVESTIGATING PROCESS**

Upon receiving a complaint being reported, an investigation will be conducted as discreetly as possible to avoid embarrassment to the parties and will record the dates, times and circumstances concerning the parties. Both the complainant and the person being complained will be separately interviewed, as with any other individuals who may be able to support/corroborate/provide any relevant information regarding the circumstances. The outcome of the investigation will be communicated to the complainant and all final decisions to be examined by FortNynja.



## CODE OF CONDUCT - HARASSMENT POLICY

### Event : Insurance Innovation Hackathon 2022

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#### 6. FALSE ACCUSATIONS

Although FortNynja encourages anyone suffering from harassment to report the matter, any false accusations, fabricated allegations or otherwise complaints against another made in bad faith are considered as misconduct and there may be disciplinary measures taken against the person making such accusations, allegations or complaints.

#### 7. CONFIDENTIALITY

All Parties involved in investigations of this nature are required to keep the investigation confidential to the extent such confidentiality is in accordance with applicable laws when FortNynja concludes that confidentiality is necessary to maintain the integrity of the investigation (for example, where confidentiality is necessary to prevent a coverup, collusion, fabrication of information, copycat testimony or evidence, retaliation against the accused, accuser, or witness, damage to the reputation of any employee, witness, accused, accuser, or the Company, destruction or manipulation of evidence, or theft or misappropriation of trade secrets, confidential information, or privileged information, or where there is a potential for future criminal charges arising out of the matters under investigation). Failure to do so may result in disciplinary action. Appropriate action will also be taken to deter any future harassment, discrimination or retaliation.