



## **Code of Conduct (Anti-Discrimination and Harassment Policy)**

### **Purpose and scope**

At Keen we believe in human capital first, which also means we treat people with respect and equality. We are committed to providing a healthy work environment and culture and extend those commitments to our dealings with all external parties. Whether you work in Keen or are interacting with us, you should at all times feel welcomed, respected and included.

The perceived power relationship between investors and founders should be recognised by all investors and they should be mindful never to abuse this position when interacting on potential investments or post investment.

We expect everyone associated with Keen to abide by this code of conduct, that includes but is not limited to; employees, contractors, founders, funders, investors, mentors, partners, advisors and attendees of our events. The code of conduct also applies in any setting associated with Keen, such as offices, work events, social outings, conferences, homes, lodgings, phone calls, video conferences, emails, chat, social media, blogs, or other online communications.

### **Unacceptable behaviours**

#### ***Discrimination and harassment***

Discrimination is unfairly treating a person or group of people differently from other people. Harassment is unwanted and unwelcome words, deeds, actions, gestures, or behaviours that make someone feel uncomfortable. Discrimination on the basis of age, disability, gender reassignment, marriage and civil partnership pregnancy and maternity, race, religion or belief, sex (gender) and sexual orientation is not only illegal it is wrong and unacceptable. Types of discrimination include direct discrimination (directly treating someone less favourably), indirect discrimination (discriminating a group who share a certain protected characteristic to put them at a disadvantage against those without the characteristic), harassment (unwanted conduct towards an individual) and victimisation (disadvantage to an employee who for example made an allegation of discrimination). This includes but is not limited to:

- Negative comments or discrimination based on age or family role
- Asking a job applicant about their health, absences from work or disability before offering them employment
- Deliberate mis gendering (e.g., using different pronouns than requested)
- Ignoring an employee for promotion because they are in a civil partnership
- Discriminating against pregnant people or mothers
- Racial or ethnic slurs
- Discriminatory comments against members of marginalised religions as a group
- Misogynist comments
- Homophobic or transphobic comments or slurs

### ***Sexual Harassment***

Sexual harassment means any unwanted, unwelcome or uninvited behaviour of a sexual nature which a reasonable person in the circumstances would find humiliating, intimidating or offensive. Sexual harassment doesn't have to be repeated or ongoing. Sexual harassment takes many forms, from sexual comments to actual physical violence. Keen has a zero-tolerance to any form of sexual harassment. Some examples of sexual harassment include:

- Verbal harassment: Sexual or sexually suggestive comments, jokes, insults, metaphors, pranks or gestures
- Propositions: invitations or advances including repeated requests for dates, drinks or personal contact, including condescending remarks or inappropriate sexually-themed communication in person or online
- Sexual assault or coercion, including sexual activity under pressure or threat, for a reward, or in a context where it is difficult for the recipient to say no. This may include requesting sexual activity in exchange for reward including funding, referrals, future employment, promotion, or invitation to exclusive events
- Non-verbal assault can take the form of touching, leering, brushing against the body or displaying sexually suggestive objects, pictures, posters or cartoons

### ***Other Types of Harassment***

- Advocating for or supporting any unacceptable behaviour
- Deliberately and repeatedly acting in a manner, either directly or indirectly, which is contrary to the terms (or the spirit) of this code of conduct
- Threatening, rewarding, or otherwise coercing someone to not report or lie about a violation of the code of conduct
- Physical conduct such as assault

## Reporting and investigating

Any individual either external or internal to Keen Venture Partners that believes an incident or incidents of harassment or discrimination has taken place, should report this in the knowledge that it will be investigated swiftly and without prejudice.

All complaints can be emailed to Sara McMunn, Operating Partner of Keen Venture Partners, [sara@keenventurepartners.com](mailto:sara@keenventurepartners.com). Alternatively, please report it to anyone within Keen whom you feel comfortable discussing the matter with and they should then escalate the complaint.

Reports will be acknowledged within three business days and actioned within 10 business days. Depending on the degree of violation, actions may include:

- Nothing – if no violation has occurred
- Verbal warning
- Written warning
- Temporary or permanent ban from events/spaces/boards
- Suspension
- Removal of responsibilities
- Termination of employment
- Reporting to the authorities