

ART-Biopharma's Anti-Harassment Policy

Effective Date: 03.06.2025

Approved By: Dr. David Shahbazian CEO

1. Purpose

ART-Biopharma is committed to maintaining a respectful, inclusive, and harassment-free workplace, even in a fully remote environment. This policy outlines our zero-tolerance stance toward harassment of any kind and establishes clear procedures for reporting and addressing incidents.

2. Applicability

This policy applies to all employees, contractors, partners, and anyone working on behalf of ART-Biopharma, including interactions in:

- Virtual meetings (Zoom, Microsoft Teams, etc.).
- Digital communications (e-mail, WhatsApp, or other messaging platforms).
- Social media or professional networks (LinkedIn, Facebook, etc.).
- Any work-related online activity.

3. Definition of Harassment

Harassment includes any inappropriate conduct, whether verbal, written, or visual that creates an intimidating, hostile, or offensive work environment. Examples specific to our remote operations:

- **Sexual Harassment:**
 - Unwanted sexual comments, jokes, or imagery shared via email/chat.
 - Inappropriate advances during video calls (e.g., suggestive remarks about appearance).
- **Discriminatory Harassment:**
 - Offensive comments about race, gender, religion, etc., in virtual meetings or messages.

- Exclusion from digital platforms or projects based on personal characteristics.

- **Cyberbullying:**

- Repeated hostile messages or public shaming in team channels.
- Sharing private communications without consent.

4. Remote-Specific Guidelines

To align with our 100% online operations, all employees must:

- **Virtual Meetings:**

- Avoid background visuals/audio that could be deemed offensive.
- Respect boundaries (e.g., no unsolicited screen-sharing of personal content).

- **Digital Communication:**

- Use professional language in all work-related chats/emails.
- Report unsolicited personal messages (e.g., DMs on non-work platforms).

- **Data Privacy:**

- Do not misuse contact details (e.g., texting colleagues outside work hours for non-urgent matters).

5. Reporting Procedure

Any employee who experiences or witnesses harassment in our fully remote work environment is strongly encouraged to report the incident promptly. Reports may be submitted either anonymously or with identification. In accordance with Armenian labor legislation and international workplace standards, a formal evidence is not required to initiate a preliminary assessment. All reports will be handled with strict confidentiality, and the company will take all necessary measures to protect the dignity, privacy and rights of all individuals involved. The procedures for submitting a report are outlined below:

- **Submit a Complaint:**

- Email Dr. David Shahbazian, CEO at david.shahbazian@art-biopharma.com
- Include screenshots, meeting transcripts, or other evidence.

- **Investigation:**

- The CEO will conduct a confidential review within 5 business days.
- Involved parties may be asked to provide additional details.

- **Resolution:**
 - Confirmed violations may result in:
 - Formal warnings.
 - Suspension of access to company platforms.
 - Termination of contract.
 - Retaliation against reporters is strictly prohibited.

- **Complaint which Involes the CEO:**

If an employee would like to report a concern involving the CEO or feels uncomfortable reporting to them, they should seek their own legal advisor with experience in labor and anti-discrimination law to allow for fair and unbiased representation.

6. Training & Accountability

- **Mandatory Annual Training:**
 - As we grow in the future ART-Biopharma will implement online training for all staff to complete on recognizing and preventing digital harassment .

- **Responsibilities of Management:**
 - Address inappropriate behavior immediately (e.g., muting disruptive participants in calls).

7. Policy Review

This policy will be reviewed annually to adapt to evolving remote work challenges when required and as the company continues to grow.

8. Summary

ART-Biopharma operates completely remote, and our policies reflect our commitment to a safe, respectful digital workspace. Violations undermine our culture and will not be tolerated. This policy is in accordance with the Labor Code of Armenia (Articles 23, 26 and 115) which protect the dignity and personal rights of employees and in alignment with international workplace standards.