



**POLICY ON THE PREVENTION AND HANDLING
OF WORKPLACE BULLYING
AT TRIANGLE GÉNÉRATION HUMANITAIRE**

JUNE 2026

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Statement by Triangle Génération Humanitaire

TGH is committed to creating a safe and equitable environment for all its employees and beneficiaries.

TGH pays particular attention to the protection, prevention, and handling of situations involving psychological harassment.

In this policy, TGH sets out guidelines for the prevention and handling of situations of workplace bullying.

This document aims to raise awareness among TGH staff about the risks associated with this issue by outlining a number of essential principles to be understood and respected.

This Policy also aims to encourage TGH staff members to reflect on their behaviors and actions.

Application and Use

TGH's Policy on the Prevention of Workplace Bullying applies to all association staff (Headquarters, international and national staff). Although not subject to labor law, TGH volunteers are required to adhere to the principles of this policy.

This policy is intended as a practical guide. It is therefore a living document that must be reviewed regularly. The Policy is available to all staff, who are required to familiarize themselves with it.

Definition of Psychological Harassment

Moral harassment in the workplace consists of repeated acts intended to or resulting in:

- deteriorate the victim's working conditions by potentially infringing upon their rights and dignity
- to impair their physical or mental health
- or to jeopardize their professional future

In France, for example, the Penal Code further specifies that, "*harassing another person through repeated remarks or behavior intended to, or having the effect of, causing a deterioration of working conditions likely to infringe upon their rights and dignity, impair their physical or mental health, or jeopardize their professional future*" is punishable by two years' imprisonment and a fine of €30,000 (Penal Code Art. 222-33-2).

Fundamental Principles

The perpetrator of harassment may be any person working within TGH. This may include the employer, a supervisor, a coworker, or a subordinate in relation to a supervisor.

Employees, as well as trainees and interns, are protected against psychological harassment. Thus, no person may be disciplined, dismissed, or subjected to direct or indirect discriminatory measures for having suffered or refused to suffer repeated acts of psychological harassment, or for having reported or testified about such acts.

Moral harassment constitutes misconduct, which, depending on the circumstances, may be classified as "serious misconduct." It is therefore grounds for disciplinary action, including dismissal.

Operational Provisions

► Identifying situations of psychological harassment

The elements constituting psychological harassment

Repetition of acts: Harassment implies **a repetition of acts** and cannot result from a single isolated act.

Absence of intent: For harassment to be recognized, it is sufficient that the perpetrator's behavior has the effect of harming the victim, regardless of whether the perpetrator intended to do so.

Personal impact of the harassment on the victim: Psychological harassment may be recognized if the perpetrator's behavior is likely to:

- infringe upon the victim's rights and dignity
- or to impair their physical or mental health
- or jeopardize their professional future

Examples of conduct deemed by the courts to constitute psychological harassment

Isolation of the employee: Sidelining, systematic exclusion from meetings, systematic behavior aimed at preventing the employee from working normally, stripping them of all responsibilities, depriving them of their work tools, or even forbidding other employees from speaking to them...

Belittling the employee: Bullying, humiliating reprimands, excessive and unlawful surveillance, insults, public humiliation, systematic devaluation, constant questioning of skills, results, or word...

Managerial harassment: The implementation of management methods that go beyond the mere motivation of employees or what is acceptable in a professional context. The Court of Cassation has held that management methods implemented by a supervisor may constitute psychological harassment "whenever they manifest themselves, for a specific employee, through repeated actions intended or resulting in a deterioration of working

conditions likely to infringe upon their rights and dignity, impair their physical or mental health, or jeopardize their professional future"...

Unjustified modification of working conditions: change of position, schedule, or workplace without objective grounds; excessive or insufficient workload (assignment of unrealistic tasks or, conversely, deprivation of work) with the intent to harm the employee...

▶ Preventing situations of psychological harassment

To ensure that the Policy on the Prevention and Handling of Psychological Harassment is understood, adopted, and applied, it must be properly communicated to TGH teams.

The employer's duty to prevent

TGH is bound by a duty to protect the health and safety of its staff. The employer's duty to prevent harassment includes the obligation to take measures to prevent acts of harassment from occurring within the company and the obligation to put an end to such acts.

In this context, TGH is implementing:

- Awareness campaigns
- Training sessions for managers
- Periodic assessments of psychosocial risks

For all employees under French law - the role of the staff representatives (CSE) and occupational health services

Role of the CSE: As part of its general responsibilities to ensure the health, safety, and mental well-being of employees, the Social and Economic Committee (CSE) of Triangle Génération Humanitaire may initiate any measures it deems appropriate and propose actions to prevent workplace bullying. The CSE may also be informed and consulted on issues of psychological harassment within the scope of its general responsibilities regarding matters pertaining to the organization, management, and overall operations of the company, particularly concerning employment and working conditions.

CSE Contact: cse@trianglegh.org

Role of the occupational physician: As part of their duties, occupational health services must advise employers, employees, and their representatives on the provisions and measures necessary to prevent sexual or psychological harassment.

Occupational Health Contact: vaise@promeom.fr

For national employees - the role of employee representatives

Where present, employee representatives are tasked with informing employees, improving their working conditions, and implementing preventive measures. In this context, they are responsible for preventing situations of psychological harassment and must take action to that end, particularly in accordance with this policy.

▼ Reporting, investigating, and addressing psychological harassment

Any instance of psychological harassment must be reported promptly so that an investigation can be launched and appropriate measures taken if the allegations are substantiated.

Reports

Any employee who believes they are a victim of or witness to psychological harassment may:

- Inform their manager
- Contact their Human Resources department
- Contact their employee representative bodies

At the same time, the employee—whether a victim or a witness—can submit a report to stopabuse@trianglegh.org.

This email address is dedicated to cases of sexual harassment and psychological harassment and is accessed only by the two PSEA representatives at headquarters.

Cases of psychological harassment will be forwarded directly to the HR manager at headquarters.

Investigations

When faced with an accusation of psychological harassment within the organization, TGH is committed to taking action and implementing all necessary measures to verify the reported facts and objectively distinguish genuine cases of harassment from mere baseless allegations.

Depending on the severity and complexity of the reported incident, TGH may choose to outsource the investigation process by engaging specialized external resources (consultants, organizations specializing in mediation, conflict management, etc.).

Internally, the investigation may be conducted by a team composed of employee representatives, management representatives, and, if necessary, the occupational physician.

Special attention will be given to providing victims with a supportive space to speak. In this context, the CSE (for employees under French law) or a staff representative on-site (for national employees) may accompany an employee, at their request, throughout the procedure. They may provide one of their members trained in active listening, or refer the employee to an occupational psychologist or an internal support service. The CSE or the on-site employee representative may also request a temporary change of position, team, or schedule to protect the employee or propose a job accommodation. Discussions between the employee and the CSE or employee representatives are treated as strictly confidential.

The investigation must adhere to the following principles:

Presumption of innocence: Until the investigation is closed and no wrongdoing has been proven, the accused employee is presumed innocent.

Impartiality: Those conducting the investigation must have no direct reporting relationship with or animosity toward either party.

The adversarial nature of the procedure: Each party must be heard to present their version of the facts.

Confidentiality: All reported cases must be handled confidentially, with a view to protecting the victim(s), complainants, and potential witnesses, and to ensuring the necessary presumption of innocence.

The right to assistance: The employee may, if they wish, be assisted (by another employee, a member of the Social and Economic Committee, or a staff representative, for example) during their interviews.

Sanctions

If the occurrence of psychological harassment is established, TGH is required—given its duty of care and prevention—to impose sanctions. An employee's commission of acts of harassment necessarily constitutes misconduct, but whether it is classified as serious misconduct is not always recognized and will depend on the severity of the acts.

The sanction can range from a simple warning to termination, depending on the severity of the acts.

Mediation

A mediation procedure may be initiated by any member of the association who considers themselves a victim of psychological harassment or by the accused party. The choice of mediator is subject to agreement between the parties.

Protection of Victims and Witnesses

No employee may be disciplined, terminated, or subjected to discriminatory measures for reporting incidents of psychological harassment in good faith.

Support measures may be offered (HR support, occupational health services, temporary adjustments to the job).

Effective Date

This policy takes effect on **June 1, 2026**, and will be communicated to all staff.

It may be revised to reflect legal and organizational changes.