

Workplace Discrimination, Harassment, and Violence Policy and Program

COMDU.IT

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1.0 Scope

comdu.it (the “organisation”) is committed to maintaining a positive and professional workplace, free of discrimination, harassment, and violence. In the Workplace Discrimination, Harassment, and Violence Policy and Program (the “Policy”), the organisation sets out its policy and program for identifying, preventing, and reporting discrimination, harassment, and violence in the workplace.

This policy binds the actions of the following:

1. All “workers” meaning any volunteer or employee of the organisation, including volunteers, regular employees, new hires, contract, casual, temporary, part-time and student workers; and
2. All “managers,” meaning any of the organisation’s supervisors, managers, members of the Board of Directors, chairs of subcommittees of the Board.

This policy applies not only to how the above individuals should treat each other, but also to how the organisation’s workers and managers must treat the members of the general public that they come interact with over the course of their organisational activities. This includes prohibitions on discrimination, harassment, and violence by workers and managers against the organisation’s beneficiaries and partners. This is further reflected in the organisation’s *Code of Conduct*.

All persons or corporations, including vendors and contractors, who work or provide services to the organisation, but are employed by another company, are encouraged to review that other company’s workplace discrimination, harassment, and violence policies, if applicable.

1.1 Legislative Origins

The Policy is designed to meet the organisation’s requirements under:

1. *Ontario Human Rights Code*, RSO 1990, c H.19, <http://canlii.ca/t/53kb6> (the “Code”); and
2. *Occupational Health and Safety Act*, RSO 1990, c O.1, <http://canlii.ca/t/53mkh> (the “Act”).

1.2 Training

The organisation will provide its workers with appropriate instruction, information, and training regarding this policy, so that all its workers know:

1. When encountering workplace discrimination:
 - a. How to request accommodations on the basis of *Code* grounds.
2. When encountering workplace harassment:
 - a. How to report harassment, including if a manager is the alleged harasser;

- b. How the organisation will investigate and deal with harassment complaints;
 - c. How the organisation will notify parties of the investigation results and any corrective actions; and
 - d. How the organisation will retain information about harassment complaints; and
3. When encountering workplace violence:
- a. How to summon immediate assistance;
 - b. How to report the violence; and
 - c. How the organisation will investigate and deal with violence complaints; and
 - d. How the organisation will retain information about violence complaints; and

1.3 Forms

Enclosed in the Policy are the following forms:

1. Appendix A: comdu.it's Most Recent Workplace Violence Risk Assessment
2. Appendix B: Workplace Harassment or Violence Complaint Form.

1.4 Review

The organisation will review the Policy if any gaps are identified as a result of a complaint or investigation, but at a minimum, biennially.

2.0 Workplace Discrimination

2.1 Definitions

Everyone at the organisation has a right to equal treatment with respect to employment without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability. These are known as the *Code* "grounds."

"Disability" means:

1. Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
2. A condition of mental impairment or a developmental disability,
3. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
4. A mental disorder; or
5. An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

2.2 Duty to Accommodate

Where a worker's *Code* ground affects their ability to perform their job duties, the worker should inform the organisation of their need for accommodation in a timely fashion. Ideally, the worker should make their accommodation request in writing, though this is not mandatory.

As well, where a manager independently knows or ought reasonably to know that a worker may require accommodation on the basis of a *Code* ground, the organisation will reasonable make inquiries of the worker as to their possible need for accommodations.

The organisation will consider all accommodation requests in good faith. If the organisation requires further information from the worker, it will limit any request for information to that which is reasonably required to assess the nature of the restriction and to make the accommodation.

The organisation will provide reasonable accommodations to the worker. The worker is not required to accept unreasonable accommodations, but the worker may not receive the accommodation of the worker's choice. The organisation will accommodate the worker up to the point of undue hardship, considering cost, outside sources of funding, and health and safety requirements.

Workers are required to participate in the accommodation process.

2.3 Disability Accommodation

Where an accommodation request relates to disability, the worker does not have to meet an onerous standard for initially communicating that a disability exists. The organisation recognizes that the provision of medical information by people with disabilities – the type, the scope and to whom – has implications for a worker's privacy.

As part of the accommodation process, the worker may generally be expected to provide supporting credible and sufficiently-detailed information that confirms:

1. The worker has a disability;
2. The limitations or needs associated with the worker's disability;
3. Whether the worker can perform their essential job duties, with or without accommodation;
4. What type of accommodations the worker may need; and
5. Regular updates about when the worker expects to come back to work, if they are on leave.

3.0 Workplace Harassment

Definitions

“Workplace harassment” means:

1. Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or
2. Workplace sexual harassment;

“Workplace sexual harassment” means:

1. Engaging in a course of vexatious comment or conduct against a worker in a workplace because of their sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
2. Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Harassment based on a *Code* ground is also considered discrimination.

Examples of harassment include, but may not be limited to:

1. Unwelcome remarks, jokes, insults, nicknames, innuendo, or taunting;
2. Bullying;
3. Repeated offensive or intimidating phone calls or emails;
4. Posters, notices, bulletins, or electronic photos which may cause offence and encourage discrimination, or create a hostile environment;
5. Racial or ethnic slurs, and use of terminology that reinforces stereotypes based on prohibited grounds;
6. Abuse of supervisory authority that endangers a person's employment, work performance or interferes or negatively influences the person's career. This includes misuses of power including intimidation, threats, blackmail and coercion; and
7. Public humiliation or degrading behaviour to a subordinate or co-worker; swearing or yelling, at subordinate or co-worker in an aggressive manner.

Examples of sexual harassment specifically can include, but may not be limited to:

1. Unwelcome remarks, jokes, innuendoes, or taunting about a person's body, attire or sex;
2. Practical jokes of a sexual nature which cause awkwardness or embarrassment;
3. Displaying pornographic pictures, posters, graffiti or other offensive material;
4. Questions or comments about an individual's sexual preferences;
5. Leering (suggestive staring) or other obscene or suggestive gestures;
6. Unwanted sexual flirtations, advances, or propositions;
7. Unwanted physical contact including touching, kissing, patting and pinching;
8. Persistent unwanted contact or attention following the end of a consensual relationship; and
9. Stalking.

Reasonable action taken by the organisation relating to the management and direction of workers or the workplace as a whole is not workplace harassment, even if there are possible unpleasant consequences for a worker. Examples of non-harassment reasonable action can include scheduling requests, annual performance reviews, disciplinary action, performance management, policy implementations, etc.

4.0 Workplace Violence

4.1 Definitions

“Workplace violence” means:

1. The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;

2. An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker; and
3. A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

The organisation will take whatever steps are reasonable to protect workers from workplace violence from all sources, including from customers, clients, employers, supervisors, other workers, and members of the public.

Examples of workplace violence may include:

1. Verbally threatening to attack a worker;
2. Leaving threatening notes at or sending threatening e-mails to a workplace;
3. Shaking a fist in a worker's face;
4. Wielding a weapon at work;
5. Hitting or trying to hit a worker;
6. Throwing an object at a worker;
7. Sexual violence against a worker;
8. Kicking an object that the worker is standing on, such as a ladder;
9. Acts that would constitute offences under Canada's *Criminal Code*; and/or
10. When someone who has a personal relationship with a worker, such as a partner, ex, or family member, threatens to, attempts to, or does in fact physically harm a worker at work. In these situations, domestic violence is considered workplace violence.

Workplace violence does not include most accidental situations, even if a worker is hurt as a result of the accident (for example: someone tripping over an object and inadvertently pushing a worker as a result).

Risk Assessment of Workplace Violence

The organisation will assess the risks of workplace violence that may arise from the nature of its workplace, the type work it does, and/or the conditions of its work. This assessment will take into circumstances that would be common to other similar workplaces, as well circumstances specific to the organisation's own workplace.

The organisation will reassess the risks of workplace violence as often as is necessary to ensure the Policy continues to protect workers from workplace violence, but at a minimum, biennially.

The organisation will advise the workers of the results of its assessments. A copy of the organisation's most recent workplace violence risk assessment is attached at *Appendix A*.

4.2 Domestic Violence

The organisation recognizes that domestic violence can put the targeted worker at risk in the workplace, and may also pose a threat to co-workers.

When the organisation is aware, or ought reasonably to be aware, that domestic violence may occur in the workplace, and that it would likely expose a worker to physical injury, it will take every precaution reasonable in the circumstances to protect its workers.

The organisation may become aware of domestic violence:

1. When an incident takes place at the workplace;
2. When a concern is reported by a targeted worker, co-workers, or someone else;
3. Threatening emails and phone calls received at work; and/or
4. Unwelcome visits at the workplace, such as by an abusive partner.

The organisation encourages workers to inform their manager, if they fear domestic violence may enter the workplace.

The organisation will work closely with the targeted worker to develop reasonable and context-specific precautions to address the situation, while attempting to respect the worker's privacy. Reasonable precautions may include the development of an individual safety plan for the affected worker.

The organisation may also independently take action to protect the targeted worker and/or other workers, depending on the circumstances.

4.3 Disclosing Persons with a History of Violence

The organisation will provide workers with information, including personal information, related to a risk of workplace violence from a person with a history of violent behaviour, if:

1. The worker can be expected to encounter the violent person in the course of their work, and
2. The risk of workplace violence is likely to expose the worker to physical injury.

The organisation will evaluate the circumstances of the person's history of violent behaviour and determine which workers would be likely to encounter this person in the course of their work and whether the person poses a risk to those workers. Some factors the organisation will consider in this assessment include:

1. Was the history of violence associated with the workplace or work?
2. Was the history of violence directed at a particular worker or workers in general?
3. How long ago did the incident(s) of violence occur?
4. What measures and procedures are in place in the existing workplace violence program?

Where the organisation determines disclosure is necessary, and in order to respect privacy, the organisation will only disclose the personal information that is necessary to protect the worker from physical injury.

5.0 Filing a Harassment or Violence Complaint

Individuals who experience harassment or violence may be reluctant to report it. Thus, the organisation's workers or managers who observe a situation involving harassment or violence in the workplace should report the incident themselves.

Workers who are concerned about their immediate safety should:

1. Remove themselves from the violent or potentially violent situation immediately;
2. Call 911, if appropriate; and
3. Report the incident to their supervisor as soon as possible, using the steps below.

Workers can report workplace harassment or violence in writing or verbally:

1. Workers are encouraged to use the *Workplace Harassment or Violence Complaint Form* to file complaints in writing (see *Appendix B*). Using this form will help the organisation address the complaint promptly. However, whether or not the worker uses the complaint form, the organisation will ensure an appropriate investigation is held.
2. When a worker reports harassment verbally, the manager who receives the complaint should promptly complete the *Workplace Harassment or Violence Complaint Form* (see *Appendix B*).

Workplace harassment or violence should be reported as soon as possible after experiencing or witnessing an incident.

A manager who knows or should reasonably have known that harassment or violence may have occurred must take appropriate action. Managers who do fail to do so will be considered to have condoned the harassment or violence. They may be subject to discipline, including termination of employment.

5.1 Recipient of Complaint

Workers must be able to report workplace harassment or violence to a person who will objectively address the complaint and who is not under the direct control of the alleged harasser. Depending on who the alleged harasser is, the complaint should be made to:

1. Report the complaint to the Founding Chair (chair@comdu.it) or
2. If the above-identified individual is the alleged harasser or attacker, report the complaint to the alternate contact: Company Secretary (secretary@comdu.it)

5.2 Content of Complaint

The complaint, whether provided by a worker or manager, and whether provided orally or in writing, should provide as much of the following information as possible:

1. Name, role, and contact information of the worker who allegedly experienced workplace harassment or violence.
2. Name, role, and contact information of the alleged harasser, if known.
3. Names and contact information of any witnesses or other persons with relevant information.
4. Details of what happened, including date, description, and location of each complained-about action.
5. Any supporting and/or relevant documents in the worker's possession.
6. A list of any supporting and/or relevant documents that may be in the possession of the alleged harassers, witnesses, and/or other individuals.

5.3 Investigation

When the organisation's management becomes aware of a workplace harassment or violence complaint, they will ensure that an investigation that is appropriate in the circumstances is conducted into the alleged harassment or violence.

The organisation will determine who will conduct the investigation into the workplace harassment or violence complaint. This could include an internal investigator, such as a manager. If the alleged harasser is a manager, the organisation will refer the investigation to an external investigator for an impartial investigation.

The investigation must be objective. The investigator, whether internal or external to the workplace, must not be directly involved in the incident or complaint. The investigator must not be under the direct control of the alleged harasser. The investigator should have knowledge of how to conduct an investigation appropriate in the circumstances.

The investigation must be completed in a timely manner and generally within 90 days or less, unless there are extenuating circumstances warranting a longer investigation (i.e. illness, complex investigation, more than five witnesses, key witness unavailable due to illness). The parties to the complaint should be updated periodically on the status of the investigation.

The investigator, whether internal or external, will, at minimum, complete the following:

1. The investigator must ensure the investigation is kept confidential and identifying information is not disclosed, unless necessary to conduct the investigation. The investigator should remind the parties of this confidentiality obligation at the beginning of the investigation.
2. The investigator must thoroughly interview the worker who allegedly experienced the workplace harassment or violence.
3. If the alleged harasser is a worker or management at the organisation, the investigator must thoroughly interview the alleged harasser. If the alleged harasser is not a worker or management at the organisation, the investigator should make reasonable efforts to interview the alleged harasser. During this interview, the investigator will give the alleged harasser the opportunity to respond to the specific allegations raised by the worker.
4. If the alleged harasser raises new information that was not previously addressed in the original complaint or the investigator's interview with the worker, the investigator will give the worker a reasonable opportunity to reply to the alleged harasser's new information.
5. The investigator must interview any other relevant witnesses employed by the employer.
6. The investigator must make reasonable efforts to interview any relevant witnesses who are not employed by the employer, if any such individuals are identified.
7. The investigator must collect and review any relevant documents.
8. The investigator must take appropriate notes and statements during their interviews with the worker, the alleged harasser, and any witnesses.
9. The investigator must prepare a written and sufficiently detailed report summarizing the steps taken during the investigation, the complaint, the allegations of the worker who allegedly experienced the workplace harassment or violence, the response from the alleged harasser, the evidence of any witnesses, and the evidence gathered. The report must set out findings of fact. The report must come to a conclusion about whether workplace harassment or violence was found or not. The report must be provided to the organisation to take appropriate action.

5.4 Interim Measures

While the organisation is investigating a workplace harassment or violence complaint, it will take appropriate interim measures to ensure the safety and dignity of the affected workers. This can include scheduling changes.

5.5 Corrective Action

If an investigation confirms that workplace harassment or violence has occurred, the organisation will consider appropriate corrective action, such as requirement to provide a formal apology, counseling, training, shift changes, reprimands, suspension, job transfer, or termination.

The organisation's choice of appropriate corrective action will depend on the nature or severity of the behaviour and the circumstances.

5.6 Notification of Investigation Results and Corrective Action

Within 10 business days of the investigation's completion, the organisation will inform the worker and the alleged harasser (if they are a worker or management) in writing of:

1. The results of the investigation. The results of the investigation are not the same as the investigation report. The results of the investigation are a summary of the findings of the investigation. The results will state whether or not the investigation substantiated the complaint; and
2. Any corrective action the organisation has taken or will take to address the workplace harassment or violence, if the investigation found harassment or violence had occurred. The amount of information provided about the corrective action will depend on the circumstances, but must indicate what steps the organisation has taken or will take to prevent a similar incident of workplace harassment or violence.

5.7 Confidentiality and Record Keeping

While the investigation is ongoing, the worker who has allegedly experienced harassment or violence, the alleged harasser, and any witnesses should not discuss the complaint or investigation with each other or with others, unless necessary to obtain advice about their rights.

The investigator may discuss the investigation and disclose the incident or complaint-related information, only as necessary to conduct the investigation.

When workplace violence results in a person being killed or critically injured, the organisation will notify an inspector at the Ministry of Labour, the Joint Health & Safety Committee (if any), and the trade union (if any), of the occurrence immediately by telephone. The organisation will also notify the Director of the Ministry of Labour in writing within 48 hours of the incident.

The organisation will keep records of the investigation for at least one year, including:

1. A copy of the complaint or details about the incident;
2. A record of the investigation including notes;
3. A copy of the investigation report;
4. A copy of the investigation results; and
5. A copy of any corrective action taken to address the alleged harassment or violence.

The organisation will not disclose information obtained about an incident or complaint of workplace harassment or violence, including identifying information about any individuals involved, unless the disclosure

is necessary for the purposes of investigating, or taking corrective action with respect to the incident or complaint, or is otherwise required by law.

6.0 Reprisal

Reprisals or the threat of reprisal is defined as acts or threats, particularly by a person in authority, designed to:

1. Punish an individual who has reported workplace discrimination, harassment, or violence; or
2. Dissuade an individual from reporting workplace discrimination, harassment, or violence.

In sexual harassment cases, reprisal can also be defined as acts designed to punish an individual who has rejected sexual advances or threats if sexual advances are rejected.

The organisation will not permit reprisal against any individual who, in good faith, reports an incident of discrimination, harassment, or violence, or who participates in an investigation regarding discrimination, harassment, or violence.

The *Whistleblowing Policy* clearly outlines the mechanism through which employees, volunteers, directors, and other representatives of the organisation must report complaints, and our employees and volunteers sign a *Statement of Commitment* declaring their promise to do this. The organisation is committed to ensuring no negative outcomes occur for whistleblowers acting in good faith.

7.0 Communicating This Policy

This policy is published on the organisation's website (www.comdu.it) and provided to all employees, volunteers, directors, consultants and other representatives, and local partners

Appendix A: Workplace Violence Risk Assessment

Date Last Assessed: May 10, 2019

Current Assessment

comdu.it's placements are located in Sri Lanka. While the armed conflict ended in May 2009 and Sri Lanka has enjoyed relative peace and security since then, the Northern and Eastern provinces have remained subject to securitization issues, which has informed the context in which our international volunteers have done work since 2016.

Since the Easter Sunday terrorist attacks in Sri Lanka on April 21, 2019, we have been closely monitoring the situation and conducting an ongoing risk assessment with local partners, international missions in Sri Lanka, advisors and other supporters.

Security has been stepped up across Sri Lanka and a State of Emergency remains in place since the Easter Sunday tragedy. The Sri Lankan authorities have made a number of arrests in relation to the attacks, and security operations are ongoing, including controlled explosions of suspicious packages and vehicles, and temporary evacuations of buildings. The authorities have also announced emergency regulations that, until further notice, ban the wearing of clothing or objects that conceal the face in such a way that prevents the wearer's identification.

We remain committed to our vision of continued engagement by the diaspora with homeland communities especially in such difficult times. Our programs have and will continue to take into account the securitization framework that is an ever-present reality in Sri Lanka. However, we acknowledge that the Easter Attacks in 2019 represents a clear and present danger in Sri Lanka and the ground situation remains fluid.

We provide the commitments and recommendations below in an effort to facilitate safety measures for our volunteers, but due to the ongoing securitization issues in the North and East, we cannot guarantee the safety and security of our international volunteers in Sri Lanka.

What We Can Do

We continue to follow the travel advisories issued by Global Affairs Canada, the German Foreign Office, and the U.S. State Department.

We also notify the Canadian High Commission and the German Embassy in Sri Lanka about our international volunteers as part of our emergency response protocol.

The actual placement of international volunteers to Sri Lanka will be decided upon obtaining relevant situational information, including additional safety protocols and security measures that local partners have put in place in order to host our volunteers, threat level assessments in travel advisories, and other potential risk factors. This may entail the deferral of placements to later in the summer or calendar year, re-purposing placements as virtual volunteer positions instead, or outright cancellation of all placements.

In 2019, we plan to provide our international volunteers with an enhanced pre-departure orientation and training programme that may cover additional areas such as trauma-informed care, non-violent communication, Standard First Aid/CPR, and hostile environment awareness training.

Per our usual practice, we will arrange and partly cover our international volunteers for their health insurance while on mission. In the event of medical evacuations, repatriation will also be covered.

We provide all our international volunteers with a comprehensive pre-departure orientation that outlines safety measures and risk mitigation strategies. Our local partners also provide additional support in this regard.

What You Should Do

It is important that all applicants and successful candidates take into account and/or do the following:

1. Review and sign off on a number of legal documents, including comdu.it's Terms and Conditions, Code of Conduct, Fundraising Policy, Medical Authority, and Important Information documents. This Workplace Violence Risk Assessment should be read in conjunction with those documents.
2. Review their host country's latest travel advisory for Sri Lanka prior to departure. For example, please see Global Affairs Canada, German Foreign Office, and United States Department of State.
3. Remain vigilant, keep up to date with developments and follow the advice of local security authorities and hotel security staff.
4. Keep a low profile, avoid crowded public places, large gatherings (including religious gatherings and places of worship and luxury hotels) and any demonstrations. All of the attacks on April 21, 2019 were carried out either in places of worship or in places where foreign visitors were affected. Any further attacks may be targeted against similar locations.
5. Keep in touch with comdu.it and family and friends, ensuring they are aware of any plans you may have.

Please remember that your decision to participate in our program is yours and yours alone. If you decide proceed, please be aware of the risks.

Appendix B: Workplace Harassment or Violence Complaint Form

Workers and managers can complete this form, or use it as a guideline to assist in reporting workplace harassment and violence. comdu.it will accept written complaints in any form.

For more information, please refer to comdu.it's *Workplace Discrimination, Harassment, and Violence Policy and Program*.

Definitions

"Workplace harassment" means:

1. Engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or
2. Workplace sexual harassment

"Workplace sexual harassment" means:

1. Engaging in a course of vexatious comment or conduct against a worker in a workplace because of their sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
2. Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

"Workplace violence" means:

1. The exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
2. An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker;
3. A statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

Complaint Details

<i>Worker Information</i>	
Name:	Job Title:
Phone:	Email address:
Please confirm the preferred method of contact: <input type="checkbox"/> Phone <input type="checkbox"/> Email <input type="checkbox"/> Other:	
<i>Description of Incident</i>	
Please describe the incident, including the following: <ol style="list-style-type: none">Names and contact information of all individuals involved in the incident/s (if known), and/or description of individuals.Details of what happened, including date, description, and location of each complained-about action.Names and contact information of any witnesses or other persons with relevant information.Any supporting and/or relevant documents in the worker's possession.A list of any supporting and/or relevant documents that may be in the possession of anyone else, including the alleged harassers or witnesses. Please attach additional sheets, if necessary.	

Name of reporting individual **Signature of reporting individual** **Date**

Name of recipient manager **Signature of recipient manager** **Date**

Document Control

Last Reviewed	Prepared By	Reviewed By	Approved by	Next Review
Aug 16, 2019	Cader Law	Kumaran Nadesan	Board of Directors	Aug 16, 2020