CENTRE WEST
Group of Companies

Company Policy
PREVENTION OF WORKPLACE HARASSMENT

Purpose	This policy outlines the commitment of Centre West Group of Companies ("The Group") to create a healthy and safe workplace where all employees, persons working in the Company and visitors are not subjected to behaviours, practices or processes that may constitute harassment, vilification or victimisation. The Group is committed to develop and maintain an environment that is free of discrimination and harassment and which promotes respect for persons, integrity, equitable treatment and natural justice as well as to educate employees to recognize that harassment in the workplace is a demeaning practice that constitutes a profound affront to the dignity of persons.
Scope	Applicable to all employees and all persons including contractors, business partners and visitors.
Rev. Date	01-Jan-2024

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1.0. OVERVIEW

1.1. The Group does not tolerate the harassment of its employees in the workplace. In particular, the following are contrary to this Policy and therefore prohibited:
   a. Any employee engaging in conduct deemed to be harassment that is unwelcomed and unsolicited by the person(s) harassed.
   b. Any form of retaliation directed against an employee or third party who either complains about harassment or who participates in any investigation concerning harassment. Retaliation includes dismissal, demotion, unwanted transfer, denial of opportunities or harassment as a result of the complaint or participation in the investigation.

1.2. This prohibition applies to all full-time, probationary, and seconded employees. Our harassment policy will be made known to agents, vendors and contractors of the Group so that they should be aware that harassment of employees will not be tolerated.

1.3. The Group's zero-tolerance position on harassment in the workplace applies to all aspects of employment:
   a. Harassing another is a breach of a term or condition of employment;
   b. The career development of an employee will not be compromised as a result of the actions of a harasser; and
   c. Employees are expected to behave in a non-threatening and non-offensive manner.

1.4. Disciplinary actions including dismissal if found guilty shall be taken against any employee who contravenes this policy. The Group is duty bound to take stern actions against harassment, regardless of whether the conduct complained of was sanctioned or specifically forbidden.

2.0. DEFINITIONS OF HARASSMENT

2.1. In particular, this Policy identifies and seeks to eliminate the following types of harassment:

   a. Racial harassment - Harassment in the work conditions or working environment on the basis of race is intended to cause, or has the effect of causing, physical, mental or emotional distress at the workplace. 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 by a manager, superior, colleague or even a non-employee. It usually takes the following two forms:
      - Quid pro quo – This is when a Manager, Head of Department or a person of authority gives or withholds a work-related benefit in exchange for sexual favours. Typically, the harasser requires such favours from the victim, either rewarding or punishing the victim in some manner.
      - Hostile environment – This is when a victim is subjected to unwelcome and severe or pervasive repeated sexual comments, innuendoes, touching or other conduct of a

sexual nature which creates an intimidating or offensive place for employees to work. Sexual harassment is frequently more about power than about sex. It occurs in situations where there is unequal power between the people involved and is an attempt by the harasser to assert power over the victim.

c. Abuse of authority – Abuse of authority happens when a person uses his/her authority to interfere with an employee or the employee's job. It includes humiliation, intimidation, threats and coercion.

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

a. Insulting behaviour or comments (verbal or written)
b. Verbal, written or physical abuse, threats and assaults
c. Derogatory remarks, slurs, epithets or language
d. Unacceptable, annoying or unwanted nicknames or negative stereotyping;
e. Racist, pornographic or otherwise offensive signs, images, pictures or materials displayed
f. Coercion, unwelcome demands, invitations or requests of a sexual nature;
g. Lewd, leering, obscene or suggestive gestures
h. Unwanted or inappropriate physical contact that is non-consensual, such as kissing, pinching, stroking, fondling, patting, touching and brushing up against a person
i. Derogatory or offensive pranks and practical jokes
j. Isolation or exclusion of a person from others
k. Bullying and victimization, for example, unreasonable and persistent criticism or humiliation, unreasonable distribution of work and responsibilities
l. Inappropriate inquiries or comments about a person's sex life, religious or cultural norms, sexual orientation, family background, source of income or lifestyle
m. Abusive and offensive language or shouting including abusing a person loudly, usually when others are present
n. Repeated threats of dismissal or other severe punishment for no reason
o. Sarcasm or constant ridicule and being put down
p. Constant unreasonable criticism about work or academic performance, often about petty or insignificant matters
q. Leaving offensive messages on e-mail or the telephone
r. Electronic harassment such as through email, SMS, Facebook, Twitter or others
s. Threatening gestures or actual violence
t. Sabotaging a person's work, e.g. by deliberately withholding or supplying incorrect information, hiding documents or equipment, not passing on messages and getting a person into trouble in other ways
u. Deliberate exclusion, isolation or alienation of an employee including maliciously excluding and isolating a person from workplace activities
v. Persistent and unjustified criticisms, often about petty, irrelevant or insignificant matters
w. Humiliating a person through gestures, sarcasm, criticism and insults, often in front of clients, Management or other workers
x. Allocation of humiliating or demeaning tasks, or sabotaging a person's work
y. Spreading gossip or false, malicious rumours about a person with an intent to cause the person harm
z. Inappropriate comments about a person's appearance
aa. Making the person undertake harmful or humiliating actions

2.3. Form of Sexual Harassment encompasses various conducts of a sexual nature which can manifest themselves in five possible forms, namely:

a. Verbal Harassment – e.g., offensive or suggestive remarks, comments, jokes, jesting, kidding, sounds, questioning.
b. Non-verbal / Gestural harassment – e.g., leering or ogling with suggestive overtones, licking lips or holding or eating food provocatively, hand signal or sign language denoting sexual activity, persistent flirting.
c. Visual harassment – e.g., showing pornographic materials, drawing sex-based sketches or writing sex-based letters, sexual exposure.
d. Psychological harassment – e.g., repeated unwanted social invitations, relentless proposals for dates or physical intimacy.
e. Physical harassment – e.g., inappropriate touching, patting, pinching, stroking, brushing up against the body, hugging, kissing, fondling, sexual assault.

3.0. HARASSMENT IN THE WORKPLACE

3.1. Harassment means any verbal, written or physical conduct that is known or ought reasonably to have been known to be unwelcome, inappropriate or otherwise offensive to a person, and that such conduct demeans, humiliates, threatens him/her or otherwise violates his/her dignity. Harassment has the purpose or effect of:

b. creating an intimidating, hostile or offensive workplace;
c. interfering with the performance of an employee's functions, duties and responsibilities;
d. affecting employment opportunities or compensation.

3.2. Harassment may be motivated by one of these grounds:

a. Race or Ethnicity;
b. Skin Colour;
c. Religion;
d. Sex or Gender;
e. Place of Origin;
f. Ancestry;
g. Culture;
h. Age;
i. Mental or Physical Disability;
j. Sexual orientation;
k. Family,
l. Marital or Social Status;
m. Economic or Financial Background
n. Political Affiliation

3.3. Actions that are not workplace harassment

a. Legitimate and reasonable management actions and business processes, such as actions taken to transfer, demote, discipline, redeploy, retrench or dismiss a worker are not considered to be workplace harassment, provided these actions are conducted in a reasonable way. Managers are expected to offer constructive and reasonable advice and comment as a legitimate aspect of their role.
b. Appropriate provisions of guidance, conducting performance counselling, invoking diminished performance procedures, unsatisfactory performance procedures or misconduct procedures does not constitute harassment.

3.4. For the purposes of this policy, reference to the workplace means any place where the Group's business is carried out and other locations and situations, such as work-related off-site assignments and business travel, work-related conferences, training or social gatherings, or other locations where the prohibited conduct might have a subsequent impact on the work relationship, environment or performance.

3.5. Any employee 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 employee 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. Alternatively, the employee may seek the help of his/her immediate supervisor or Head of Department to informally approach the alleged harasser on his/her behalf.

3.6. If the employee is dissatisfied with the informal approach or finds it inappropriate in the circumstances or unsuccessful, he/she may proceed with a formal complaint at any time. Nothing prevents the employee from making such a complaint immediately if he/she feels that the conduct is serious enough to warrant such an approach. The formal complaint should be directed in writing to the Head of Human Resources Department (HR) or Group CEO or Group GM.

4.0. COMPLAINT PROCEDURE

4.1. An employee who has been directly harassed or has witnessed or is affected by the harassment of others, should report such conduct to the Head of HR or through the established grievance channels. If the employee needs help in determining whether harassment has occurred, or

whether to take the formal or informal approach, he/she could seek advice from the Head of HR. If the employee is not comfortable approaching the above mentioned official or if the latter is the subject of the complaint, the employee could/should raise the matter to the Group CEO / Group GM.

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

4.3. 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. As noted above, the Group prohibits any form of retaliation against employees.

4.4. An investigation will be conducted as discreetly as possible to avoid any embarrassment to the parties. Both the employee and the alleged harasser will be separately interviewed, as will any individuals who may be able to provide relevant information. Every employee is expected to cooperate in any investigation if so requested. The outcome of the investigation will be communicated to the employee making the complaint. Where the employee is dissatisfied with the outcome of the investigation, he/she may appeal to the Group CEO / Group GM in writing within fourteen (14) days from the date he/she is officially informed of that outcome.

4.5. A complaint received by the Head of HR or any other person will be kept strictly confidential. Information acquired from the investigation will also be kept confidential. All parties involved in the investigation, including both the victim and the harasser (alleged or otherwise), are required to keep such information secret.

4.6. Although the Group encourages an employee 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 employee making such accusations, allegations or complaints.

5.0. DISCIPLINARY MEASURES, RESTITUTION AND APPEAL

5.1. The Group treats harassment as misconduct disciplinary actions shall be taken anyone accused of such acts. If the investigation reveals evidence to support the complaint and it is upheld, the harasser will be disciplined in accordance with the Disciplinary Procedures. The nature and severity of the disciplinary measures shall commensurate with the gravity of the harassment. Such measures may therefore include suspension or dismissal. The incident will also be documented in the harasser's file.

5.2. An employee accused and found not guilty of harassment will be granted restitution deemed appropriate by the Group for any direct and foreseeable pecuniary loss suffered by him/her. For instance, where interim suspension without pay pending settlement of the case is instituted, such payment shall be reinstated.

6.0. ROLES AND RESPONSIBILITIES

6.1. Employees

a. Every employee reserves the right to be treated fairly and respectfully in the workplace and shall treat colleagues, managers and stakeholders in general in a way that respects individual's differences.
b. Employees are encouraged to address their concerns if someone behaves in a way that is offensive, humiliating or degrading and to speak up or report the complaint to an immediate supervisor or Head of HR.
c. Employees should keep a written record of the details of the alleged incident(s) of harassment, including time, locations and name of witnesses, if any. All information should be kept confidential. These are serious issues and privacy must be respected.
d. Employees shall also attend training sessions on harassment organised by the Group. All employees have a responsibility to cooperate in any investigation of a harassment complaint.

6.2. Heads of Department

a. Heads of Department should also be familiar with this policy and are expected to be alert of any signs of harassment, such as an unexplained change in an employee's performance, rumours or an employee isolating himself/herself or seemingly distracted.
b. If something does not seem right, Heads of Department should speak to the employee concerned. Having someone willing to listen often helps the employee to talk about a problem.
c. Heads of Department also have a responsibility of ensuring that the workplace remains free of harassment and in doing so, they should apply this Policy consistently.

6.3. Human Resources Department

a. The Human Resources Department is in charge of ensuring that this policy and its applicable procedures for dealing with harassment are understood by all employees. It includes making sure this Policy is consistently applied in all harassment complaints.
b. The Human Resources Department is also responsible for conducting investigations when required and review this policy and its procedures so that the aims of this policy are achieved.

7.0. The Group reserves the right to amend this policy from time to time and shall notify all employees when such amendment has been made and has been approved by the Management.

8.0. Should there be a translation of this policy into other languages, the English version of this policy shall be authoritative in the event of any dispute or confusion.