

## Group Anti-Discrimination and Anti-Harassment Policy

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Owner:	Market Heads, Market Leadership teams, and Group and Market Human Resources
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### 1. Objectives

Vitasoy International Holdings Limited (“the Group”) is committed to creating a safe and inclusive workplace, where all employees are treated with respect, free from discrimination and harassment and can contribute fully and enjoy equal opportunities.

This Policy consists of a set of general principles of anti-discrimination and anti-harassment to provide an overview of expectations and requirements for all employees to ensure this Policy is upheld across our operations. As part of the holistic approach of our sustainability governance, this Policy complements our Fair Labour Practices Policy and Group Diversity and Inclusion Policy.

### 2. Scope

The Group Anti-discrimination and Anti-harassment Policy applies to all employees of the Group including subsidiaries and joint ventures over which the Group has management control subject to local regulatory requirements. This Policy also applies to events that occur outside of the physical workplace such as during business trips or company activities.

### 3. Definitions

Discrimination and harassment in the workplace are mainly defined in the following headings.

#### 3.1 Discrimination

Discrimination is any negative action or attitude toward someone because of personal characteristics, such but not limited to nationality, race, gender, age, religions, political beliefs, sexual orientation, disability, marital status, or family responsibilities.

Discrimination occurs where an employee is treated less favorably than others without reasonable cause due to anything that is protected by discrimination legislation.

We are committed to eliminating any forms of discrimination through different communication channels, and engage our employees and stakeholders to combat discrimination through events and activities. We recognise that sometimes discrimination is unintentional, as we may all have unconscious biases that could be difficult to identify and overcome. In the event we conclude that an employee unconsciously discriminates, we will support him/her through training and counseling and implement processes that mitigate biases.

### **3.2 Harassment**

Harassment can occur when an individual at the workplace demonstrates behaviour that causes or is likely to cause alarm or distress to another person. Such behaviour violates a person's dignity or create an unfavourable work environment for that person.

Harassment can occur based on any of the grounds of discrimination and may come from a colleague or a non-employee who has business dealings with the company. Harassment can take different forms. Examples of behaviour that may be considered harassment include but are not limited to:

- Threatening or intimidating acts
- Humiliating, demeaning acts
- Abusive / insulting language, comments or other non-verbal gestures
- Bullying or cyber bullying
- Stalking

### **3.3 Sexual Harassment**

Sexual harassment is a form of harassment that can include unwelcome sexual advances, requests for sexual favours, and other verbal or physical behaviours of a sexual nature and such behaviours has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

### **3.4 Vilification**

Vilification occurs where one incites hatred, severe ridicule of, or serious contempt towards a certain employee due to his / her personal characteristics such as disability, race, religious or sexual orientation, via any activity at work and in public. Where such behaviour includes threatening physical harm to the employee concerned or damaging his/her property or premises or the property/premises of others which the employee concerned has access, this may constitute serious vilification which is a criminal offence.

## **4. Principles and Requirements**

We do not tolerate any kind of discrimination and harassment that creates a hostile and unpleasant environment for employees. If a claim of discrimination or harassment is proven, disciplinary measures will be applied, up to and including termination of employment. The following expresses our commitment to prevent and manage discrimination and harassment incidents at all levels of the organisation.

### **4.1 Company**

The Company shall implement the following:

- Setting a comprehensive strategy to address and prevent discrimination and harassment in the workplace;
- Reviewing and monitoring the implementation of the policies and practices regularly to ensure appropriate measures in place to prevent and respond to inappropriate behaviour in the workplace;
- Promoting appropriate standards of behaviour at work;
- Providing training to ensure employees understand their rights and responsibilities;
- Providing an effective and fair grievance procedure to handle and resolve complaints;
- Providing assistance to employees regarding this Policy and the grievance procedure; and
- Partnering with employees and stakeholders in different sectors to develop equal opportunities initiatives in the workplace.

### **4.2 Managers and supervisors**

All managers and supervisors have the following responsibilities:

- Implementing this Policy as part of their day-to-day management of employees;
- Applying policies and practices in a fair and equitable way;
- Addressing potential problems before they become serious;
- Acting immediately on observations or allegations of discrimination or harassment.

### **4.3 Employees**

All employees are expected to uphold and abide to this Policy by the followings:

- Refraining from any form of discrimination or harassment;
- Implementing this Policy in their day-to-day work and their interactions with other employees and customers;
- Notifying their immediate manager or supervisor or Human Resources of any concerns with regard to the conduct of other employees;
- Cooperating fully in any investigation of a discrimination or harassment complaints.

## **5. Grievance Procedure**

We will do everything possible to stop discrimination and harassment from happening, while encouraging employees to speak up if they are being discriminated against or harassed.

We do not tolerate any form of victimisation or retaliation relating to any complaint made in good faith. Victimisation and retaliation include not only conduct directed at the complainant but also conduct directed at any other person involved in any related investigation. Any victimisation or retaliation against an individual who has complained of harassment will lead to disciplinary action against the retaliator.

We continue to build awareness of our employees on their rights and strive to create a workplace with open and honest communications. We support employees to do this through our grievance channels that are set out in the Staff Handbook and the Group's Whistleblowing Policy.

## **6. Disciplinary Consequence**

Appropriate disciplinary actions will be undertaken in accordance with the severity of the discrimination or harassment issue where an employee is in breach of this Policy. For example, unintentionally offending a coworker might warrant a verbal warning, but harassing someone systematically might result in dismissal.

We may commence other applicable proceedings under the Staff Handbook, Code of Conduct or applicable policies in each operations against any person whom we consider may have breached this Policy. Such proceedings may lead to the imposition of appropriate disciplinary sanctions up to and including termination of employment.

## **7. Implementation**

Responsibility for implementing this policy lies with the Market Heads, Market Leadership teams, and Group and Market Human Resources.

## **8. Review of the Policy**

The ESG Committee will conduct a periodic review on this Policy every three years and whenever deemed necessary.