



Anti-Discrimination Policy and Procedures

Current as at 1st February 2011

This Policy is subject to the provisions of the Dictionary and Interpretation.

1. Purpose of this Policy

The Company is committed to be free of all forms of discrimination, harassment and defamation. The Company is an equal opportunity employer and thus it will strive not to discriminate and will take affirmative actions to remove any signs of discrimination during the term of one's employment.

The Company is committed to provide a working environment in which Employees are able to realise their full potential and to contribute to business success irrespective of their:

- sex
- race
- ethnicity
- national origin
- age
- religion
- disability
- marital status
- sexual orientation
- gender identity or
- any other legally protected characteristics.

This is a key employment value to which all Employees are expected to support.

In order to create conditions, in which this goal can be realised, the Company is committed to identifying and eliminating discriminatory practices, procedures and attitudes throughout the

organisation. The Company expects Employees to support this commitment and to assist in its realisation in all possible ways.

2. Scope

All Employees must adhere to the requirements of this Policy. The Company must bring this policy to the notice of all contractors and visitors and enforce their compliance with it.

This Policy will apply to all aspects of employment, including, but not limited to:

- advertisement for employment including recruitment and selection;
- placement, training and development;
- promotions and career development opportunities;
- terms and conditions of employment and access to employment related benefits and facilities;
- grievance handling and the application of disciplinary procedures; and
- selection for redundancy.

The Company will not tolerate, nor should its Employees tolerate or engage in, any form of prohibited discrimination.

3. Types of Discrimination

Discrimination can be made directly or indirectly:-

Direct Discrimination refers to overt acts which treat someone differently than others on the basis of their race, sex, disability, sexual reference, marital status or age.

Indirect Discrimination refers to general policies and rules that may, in their application, negatively impact on one group more than others.

4. The Responsibilities of the Company

Whenever a discrimination scenario arises, the following procedure will be adopted:-

- Any concern or issue will be dealt with promptly & confidentially;
- The rights of all involved will be respected; and
- A complaint may be filed against any person.

5. Procedures for Resolution

The procedures to be undertaken to resolve complaints depend on the specific circumstances of a particular case. The Company must, upon the request of any person claiming to have been

discriminated against to provide such person, within ten working days of such a request, on outline of the procedures to be used by the Company to resolve the matter.

The Company will adopt one or more of the following procedures:-

a) In-House Dispute Resolution

This is, in most cases, the desired method of dispute resolution, because it involves informal discussion. However it does not mean that it is any less effective. Strategies to be used include:-

- (i) One to One discussion with one's Line Manager;
and/or
- (ii) Mediated group discussion involving those concerned.

b) Conciliation

This is a formal means of settling a dispute and is directed to helping the parties reach a private settlement which is agreeable to all.

5.1 Steps to Obtaining a Resolution by Conciliation

a. The Employee who has alleged discrimination must submit to the Company a formal written complaint. Upon receipt by the Company of the formal complaint it will provide a copy to the respondent, who must provide a written response.

b. A conciliator, appointed by the Company, will be provided with a copy of the complaint and response and then attempt to find a solution that is agreeable to all.

c. If an agreement is not reached the Conciliator will make one of the following determinations:

- (i) Dismiss the complaint;
- (ii) Conclude the complaint as resolved;
- (iii) Issue a warning to the respondent as to their behaviour;
- (iv) Take any other step he deems fit in the specific circumstance.

d. All reasons for the decision taken must be given in writing to all parties involved.

If the complainant or the respondent feel aggrieved with the decision then they can lodge a formal appeal against the decision with the Board of Directors who will look into the matter and arrive to a definite conclusion. See Grievance Procedures for further guidance.