



Under the law, every person has the right to be free from harassment and discrimination.

1. OUR COMMITMENT

The SICOM Group is committed to providing an environment free from harassment and discrimination, where all Directors and Employees are treated with respect and dignity and have equal opportunities. Thus, harassment and discrimination are neither tolerated nor ignored. A claim of harassment or discrimination which is established could lead to termination of employment/removal from office.

2. OBJECTIVES OF THIS POLICY

The objectives of this Policy are to ensure that Directors and Employees of the SICOM Group are aware that harassment and discrimination are unlawful and are unacceptable practices and are incompatible with our standards. In addition, this Policy sets out the types of behaviour that are reprehensible.

3. APPLICATION OF THIS POLICY

This Policy applies to all SICOM Group Employees, including full-time, part-time, temporary, probationary, casual and contract staff, interns, and volunteers and Directors. By the same token, it is also unacceptable to engage in harassment or discrimination when dealing with clients and other stakeholders.

For avoidance of doubt, this Policy also applies to events that occur outside of the physical workplace such as external meetings, business trips, company parties, any official event and any other location which can be reasonably regarded as an extension of the workplace.

When joining the Company all new Employees will be made aware of the Policy during the induction session.

4. RIGHTS AND RESPONSIBILITIES

Employees and Directors across the SICOM Group are expected to uphold and abide by this Policy and cooperate fully in any investigation resulting from a harassment or discrimination complaint.

5. WHAT ARE HARASSMENT AND DISCRIMINATION?

This Policy prohibits harassment or discrimination (excluding positive discrimination as prescribed by Law) based on the following grounds or any combination of these grounds:

- age,
- race,



- colour,
- caste,
- creed,
- ethnic origin/place of origin,
- national extraction or social origin,
- gender/gender realignments,
- impairment/disability (including mental, physical, developmental or learning disabilities),
- sexual orientation,
- birth or other status,
- language,
- religion and belief,
- marital status or domestic circumstances,
- HIV status,
- political opinion,
- trade union or other opinion or belief,
- association with a minority,
- criminal record (where it is irrelevant to the nature to the employment/promotional post)
- association or relationship with a person identified by one of the above grounds or perception that one of the above grounds applies.

5.1. What constitutes harassment?

Harassment means any unwanted conduct, verbal, non-verbal, visual, psychological or physical, whether based on any or a combination of the above grounds or otherwise and which a reasonable person would have foreseen that that person would be affected negatively in his/her dignity. Harassment can also take place online or through electronic communications.

Sexual harassment and abuse of authority are specific forms of harassment.

Sexual Harassment

A person sexually harasses another person where, in circumstances in which a reasonable person would have foreseen that that other person would be humiliated, offended or intimidated, he/she –

a) makes an unwelcome sexual advance, or an unwelcome request for a sexual favour to that other person;

or



b) engages in any other unwelcome conduct of a sexual nature towards that other person.

Sexual harassment can be a pattern of behaviour or a single incident and may occur between persons of the opposite or same sex and both males and females can be either victims or offenders.

Abuse of Authority

Abuse of authority occurs where an individual improperly misuses his/her power and authority inherent in his/her position to undermine another person's performance in his/her job, or in any way maliciously interfere with, or negatively influence a person's job or career.

Abuse of authority may also include misuse of power that creates a hostile or offensive work environment, which includes - but is not limited to - the use of intimidation, threats, blackmail or coercion. It can be a one-off incident or a series of incidents. Bullying is a form of abuse of authority.

It may be that people experiencing harassment or discrimination do not object to the harassing comments or conduct because they feel vulnerable or are afraid of the consequences of speaking out. If not immediately reported, this does not invalidate harassment or discrimination.

5.2. What constitutes discrimination?

Discrimination includes affording different treatment to different people attributable wholly or mainly to the grounds listed above and which have the effect of nullifying or impairing equality of opportunity or treatment.

6. REPORTING AND PROCEDURES

6.1. For Directors

If a Director feels that he/she has been harassed, then he/she should immediately report the matter to the Chairperson. If the Chairperson is not available, or if the Director feels it would be counterproductive to inform the Chairperson, the Director should make a declaration to the Board of Directors.



6.2. For Employees

If an Employee feels that he/she has been harassed, he/she should immediately report the matter to his/her supervisor. If that person is not available, or if the Employee feels it would be counterproductive to inform that person, the Employee should immediately contact that supervisor's superior or Human Resource Department. The supervisor or supervisor's superior, as the case may be, should within 3 working days or as soon as reasonably practicable report the case to the Human Resource Department. Once the matter has been reported it will be promptly investigated and any necessary corrective action will be taken where appropriate.

All complaints of harassment will be handled in as discreet and confidential a manner as is possible under the circumstances.

6.3. Whistleblowing

It is very important to note that any person can also make a complaint under the Whistleblowing Policy if he/she witnesses any act of harassment or discrimination.

7. REVIEW OF POLICY

This Policy shall be reviewed as required.