



ANTI-HARASSMENT AND BULLYING POLICY

Harassment

The Company is committed to providing a working environment free from harassment and bullying and ensuring that all staff are treated, and treat others, with dignity and respect.

This policy covers harassment or bullying which occurs at work and out of the workplace, such as business trips or at work-related events or social functions. It covers bullying and harassment by staff (which may include consultants, contractors, and agency workers) and also by third parties such as customers, suppliers, or visitors to our premises.

The Company views harassment based on a person's, race, colour, nationality, ethnic or national origin, sex or sexual orientation, gender reassignment, marital or civil partner status, pregnancy or maternity, disability, religion or belief and age very seriously. It will be dealt with under the disciplinary procedure, and a complaint, if substantiated, may lead to summary dismissal.

Harassment is any unwanted physical, verbal, or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. Harassment may take many forms. It can range from extreme actions such as bullying to less obvious actions like ignoring someone in the workplace or treating someone less favourably because they have submitted or refused to submit to such behaviour in the past. Words or actions which are of a sexual, sexist, racist, religious or ageist nature will be treated as harassment if they have an adverse effect on working relationships or the working environment.

Examples would include:

- Unwanted sexual, racial, religious or ageist banter, the display of material of a sexual, racial nature (whether directed at the complainant or not);
- Personal remarks about a colleague (such as appearance, sexuality or any disability);
- Unwanted physical conduct or "horseplay", including: touching, pushing and grabbing, patting or pinching or coercing sexual intercourse;
- Coercion ranging from pressure for sexual favours to pressure to participate in political/religious groups;
- Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- Verbal conduct of a sexual nature: from suggestive comments and remarks on physical appearance to unwelcome sexual advances;
- Non-verbal conduct of a sexual nature: from the display of sexually suggestive pictures or writing to suggestive whistling or gesturing;
- Sex-based conduct: any derogatory or intimidatory treatment of a colleague based on their sex or sexuality, such as comments relating to dress or appearance;
- Offensive e-mails, text messages or social media content;
- Mocking, mimicking or belittling a person's disability.
- Visual displays of posters, graffiti, obscene gestures.

In all cases this concerns the behavior of others which occurs either at the workplace or in direct connection with the person's employment.



A person may be harassed even if they were not the intended “target”. For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

Bullying

Bullying is offensive, intimidating, malicious or insulting behavior involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- Physical or psychological threats;
- Overbearing and intimidating levels of supervision;
- Inappropriate derogatory remarks about someone’s performance.

Legitimate, reasonable and constructive criticism of a workers’ performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

Prevention of Harassment and Bullying

In the first instance, an employee who believes that he/she has been the subject of harassment or bullying should consider whether he/she is able to raise the problem informally with the person responsible. The employee should explain clearly to the person that their behaviour is not welcome and makes him/her uncomfortable. If this is too difficult or embarrassing, the person who has been the subject of harassment or bullying should speak to the line manager or supervisor unless they are considered to have been responsible for the harassment or bullying, in which case the General Manager, who can provide confidential advice and assistance in resolving the issue formally or informally. If the harassment or bullying continues or victimisation, discrimination or other consequences result, the employee should raise the matter formally under the Company’s Grievance Procedure.

As a general principle, the decision to progress a complaint rests with the individual concerned. However, the Company has a duty to protect its entire staff and it may pursue a complaint independently if it is appropriate to do so in all the circumstances.

We will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the accused must only be disclosed on a “need to know” basis. We will consider whether any steps are necessary to manage any ongoing relationship between you and the person accused during the investigation.

Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee, the matter will be dealt with under the Disciplinary Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will



consider how best to manage any ongoing working relationship between you and the person concerned.

In the event of legal proceedings, employees responsible for harassment may be held personally liable.

Each employee is responsible for his/her own actions and should ensure that their behavior does not breach this policy.

Protection and Support for Those Involved

Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimization as a result. Anyone found to have retaliated against or victimized someone in this way will be subject to disciplinary action under our Disciplinary Procedure.

Record Keeping

Information about a complaint by or about an employee may be placed on the employee's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process.

Signed

Andre Labuschaque

General Manager
Mabiza Resources Limited

Revision No	2021.03.05
Date Approved	2021.03.05