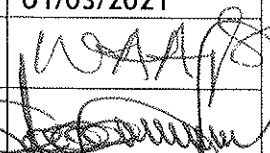
	<b>NON DISCRIMINATION AND EQUAL OPPORTUNITY POLICY</b>		Revision #: <b>2.0</b>
			Effective Date: <b>01/03/2021</b>
	Prepared by: William Agyei Amponsah - Admin & HR Manager	Date: 01/03/2021	
Document #: <b>6.1.1.</b>	Approved by: George Quarteng-Mensah - Managing Director	Date: 01/03/2021	

## 1.0 Policy Statement

It is a Policy of Plantations SOCFINAF Ghana (PSG) Limited to provide, where possible, equal employment opportunities to all its employees and to all applicants for employment regardless of race, colour, gender, religion, age, nationality, disability, marital status, sexual orientation, political conviction or on any other grounds and to provide a workplace where differences are respected and accepted and anti-discriminatory behaviour of any kind is strictly prohibited.

## 2.0 Objective

The objective of this policy is to ensure that no person shall suffer or experience less favorable treatment through discrimination or lack of opportunities

## 3.0 Scope

This Non-Discrimination and Equal Opportunity Policy applies equally to all Employees.


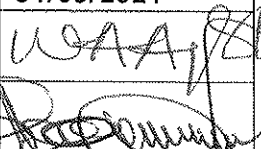
## 4.0 Guidelines

Operating within the laws and regulations that apply to the Company's activities in Ghana, the Company is committed to the principle of equal employment opportunity and Non-discrimination. This commitment is endorsed through:

- 4.1 Encouraging diverse opinions and inclusiveness in our workforce wherever possible in the course of our business while complying with local laws and regulations; this would give the workforce a sense of belonging, with regard to the company's operations.
- 4.2 Avoiding all forms of discrimination in our recruitment practices to the extent that this does not conflict with "local employment" rules.
- 4.3 Educating Employees on issues of diverse opinions, tolerance and respect for differences;
- 4.4 Proactively discouraging behavior involving harassment, bullying or disrespectful conduct by Employees towards other Employees of different race, colour, gender, religion, age, nationality, disability, marital status, sexual orientation, political conviction or on any other grounds;
- 4.5 Establishing and enforcing disciplinary procedures which include sanctions against discriminatory behaviour.

## 5.0 Procedure for Reporting Concerns about Discriminatory Behaviour

5.1 Any Employee wishing to raise concerns under this Policy should document

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details of his or her concerns in writing, including expressing a view as to how he or she would like the matter handled, and then speak to his/her Department/Sectional Head/Admin/HR Manager as the case may be (the “**Relevant Manager**”) and table his/her written concerns, as described by the internal grievance mechanism.


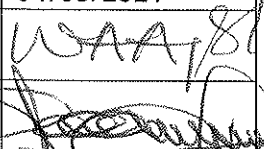
If the Employee does not wish to be identified, he or she should say so at the first possible opportunity so that appropriate arrangements can be made for the matter to be investigated in confidence.

- 5.2 The employee can direct his/her concerns also through the staff body that he/she belongs e.g. Union, SSA, etc., and the body unit can take the matter up, on behalf of its member, with the Relevant Manager.
- 5.3 In the event that the Employee elects to speak to a Relevant Manager, then it will be the responsibility of that Manager to deal with the matter confidentially within the limits of his delegated authority or based on his/her judgment, refer the matter to a higher authority.
- 5.4 In the event that the Relevant Manager is unable to guarantee that the matter will be dealt with confidentially, then the Employee may at his/her sole discretion have the right to withdraw the complaint, and no further enquiry or action will take place.
- 5.5 The Relevant Manager will decide on the appropriate course of action. This may include initiating an internal informal investigation (as the case may be) or, alternatively, a formal external investigation after consulting with the Managing Director (MD). The Relevant Manager will personally inform the Employee who raised the concern about the action to be taken prior to its initiation. The Employee can request that this information be provided in writing.
- 5.6 If a formal or an informal investigation is undertaken, the Relevant Manager will keep the Employee informed about what is happening. Again, if requested, these reports will be made in writing. In some cases, it may not be possible to report to the Employee the precise action taken as doing so might, for example, infringe on another Employee’s right to privacy or confidentiality.

## 6.0 Disciplinary Action

The Company does not tolerate the harassment or victimization of any Employee by any other Employee and will expeditiously deal with all complaints raised under the terms of this Policy and if appropriate will invoke the Company’s Disciplinary Policy to deal with the offender.

If as a result of an investigation prompted by the reporting of alleged discriminatory behaviour, an Employee is proven to have acted maliciously or in bad faith by making an allegation that he/she demonstrably knew to be untrue at the time that the allegation

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was made, then this will be regarded as misconduct on the part of the Employee and will also be dealt with through the Company's Disciplinary Policy.

## 7.0 Definitions

**7.1 Discriminatory Behaviour** within the context of the Company means prejudicial or unfavorable treatment of another person based on the individual's:

- race including skin color, national or ethnic origin or nationality; or
- sex; or
- marital status; or
- sexual preference; or
- pregnancy (including breastfeeding); or
- parental status/family responsibility; or
- age; or
- political convictions; or
- religion; or
- disability or impairment; or
- workplace status.

**7.2 Harassment** includes but is not limited to offending, bullying, coercion, intimidation, threats, vilification or humiliation of another person.


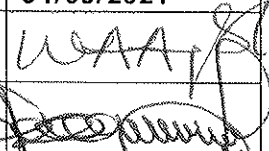
All forms of harassment represent unacceptable behavior in the workplace, but certain forms of harassment, in addition, represent unlawful discrimination. They include:

- sexual harassment;
- racial harassment; and
- disability harassment.

**7.3 Sexual harassment** takes many forms of unwelcome behavior which result in a person feeling offended, humiliated or intimidated. Such behavior includes, but is not limited to:

- Offensive comments, jokes and gestures e.g. staring or leering;
- Unwelcome or uncalled for acts of physical intimacy;
- Displaying of offensive or inappropriate material or pictures;
- Intrusive inquiries into a person's private life;
- Unwelcome references to a person's physical appearance;
- Repeated requests for dates which have been previously rejected;
- Unwelcome and uninvited requests for sexual favors; and
- Sexually offensive telephone calls or emails or text message.

To be regarded as sexual harassment, this behavior does not need to be intentional or deliberate. Where a reasonable person, having regard to all the

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circumstances, would have anticipated that the person harassed would be offended, humiliated or intimidated, then this is regarded as sexual harassment for legal purposes.

**7.4 Bullying** is a form of harassment and covers many types of unwelcome behavior. It generally involves a pattern of abuse towards an Employee which can range from very subtle behavior to overt, blatant behavior.

Some examples of bullying include:

- Yelling, abuse, offensive language, insults;
- Persecuting or oppressing behavior;
- Belittling opinions or constant criticism;
- Isolating workers from normal work interaction, training and development or career opportunities;
- Undermining work performance, deliberately withholding work-related information or resources; and
- Teasing or regularly being made the brunt of pranks/ practical jokes.

**7.5 The Workplace** is the site where the Employee undertakes the activities that he is employed to perform and include offices, as well as site and field locations. For the avoidance of doubt, activities including but not limited to social functions, end of year celebrations, and attendance at conferences, training courses, business travel and accommodation that are sponsored by the Company but do not necessarily occur on the Company's premises, are sufficiently work-related to be covered by this Policy and the law.

**NB:** **PSG Limited, as a responsible corporate entity, doesn't engage persons less than 18 years, neither does it discriminate in its activities. It is dedicated to equal opportunity for all employees.**