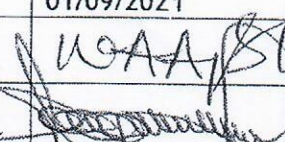
 <small>Plantations Socfinaf Ghana (PSG) Limited</small>	NO DISCRIMINATION AND HARASSMENT POLICY AND ITS GRIEVANCE MECHANISM		Revision #: 1.1
			Effective Date: 01/09/2021
	Prepared by: William Agyei Amponsah - Admin & HR Manager	Date: 01/09/2021	
Document #: HRM-6.1.1	Approved by: George Quarteng-Mensah - Managing Director	Date: 01/09/2021	

1.0 POLICY STATEMENT

Every employee has the right to work in an environment that promotes equal opportunity and which is also free from discrimination and all forms of harassment. Plantations Socfinaf Ghana (PSG) Limited is committed to:

- Providing a working environment that is free of Harassment and Discrimination. Actions, words, jokes or comments directed to an individual's gender, race, ethnicity, nationality, age, religion or any legally protected characteristics shall not be tolerated.
- Educating all employees on the issues of harassment and discrimination and to ensure employees are aware that certain types of behaviour at the workplace will not be tolerated.
- Creating fair, impartial, trusted and confidential procedures for handling and investigating harassment and discrimination complaints.
- Making all employees responsible for maintaining a harassment and discrimination free workplace.

2.0 GENERAL

This policy sets a procedure to address complaints of harassment or discrimination in a fair and impartial manner, respecting the rights, dignity and needs of confidentiality of the employee.


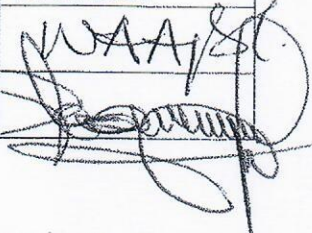
2.1 SCOPE

This policy covers all employees of PSG, and people with whom PSG employees interface during their normal course of business, e.g. contractors, suppliers, etc.

2.2 DEFINITIONS

Harassment is: any conduct or comment that is found offensive and that creates an intimidating, hostile, unwelcome or offensive work environment. Harassment occurs if an individual knew or should have reasonably known that his or her behaviour was unwelcome and offensive to the person to whom it was directed.

Discrimination is: the denial of equal treatment or opportunity in an employee's employment on any basis other than occupational requirements, or exceptions identified in applicable human rights legislation.

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Harassment and discrimination are specifically prohibited based on a person's:

- Gender;
- Ethnic Origin;
- Political Belief;
- Race;
- Colour;
- Creed;
- Religion;
- Disability;
- Marital Status; and or
- Any other prohibited ground defined by the legislative jurisdictions in which PSG operates.

2.3 CONFIDENTIALITY

The Company recognizes that some employees may find it difficult to come forward with a complaint of workplace harassment or discrimination and may wish such matters to remain confidential.


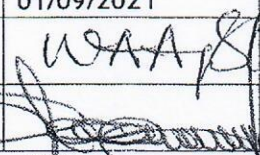
To protect the interests of the complainant, the person complained against and others, who report incidents of workplace harassment or discrimination, all employees have an obligation to maintain confidentiality, as much as possible, throughout the investigative process. However, any complainant should be advised that the person complained of have a right to know who is making allegations against him/her. Information relating to a complaint should only be disclosed to the extent necessary to:

- carry out investigative procedures;
- inform certain senior management if there is a business reason to do so; and or
- if corrective measures are warranted, to carry out those measures.

3.0 PROCEDURE

3.1 Reporting Complaints

Employees may report incidents of workplace harassment or discrimination in any of the following ways:

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- If they feel comfortable doing so, employees are encouraged to discuss their concerns with the person who is allegedly committing the offensive act by making the person aware he or she is creating discomfort in the work environment. This may be enough to resolve the situation.
- If an employee is not comfortable confronting the other party or has tried without effect, the employee may directly contact their line Manager or Admin. & HR Manager.

Employees should make an effort to report incidents of workplace harassment or discrimination in a timely manner. The individual who has been offended should keep a written record of date(s) and time(s) the unacceptable behaviour(s) occurred and a record of any witness(es).

Any witness to unacceptable behaviour is encouraged to report that behaviour in the same way complaints are reported. An employee need not be a direct victim of harassment to report an incident.

NB: For complaints that are based on gender-related issues, the complainant has the option of reporting to the Gender Representative as well, who in turn, reports the issue to the Gender Committee to take the matter up as in HRM Policy No. 6.1.5 (Gender Policy).

3.2 Investigating Complaints

Once a complaint is made, the Line Manager or Human Resource Manager will assess the complaint and decide the most effective way to deal with it. While the company is aware that employees may not always wish a formal investigation, circumstances may exist where these wishes may not be complied with.


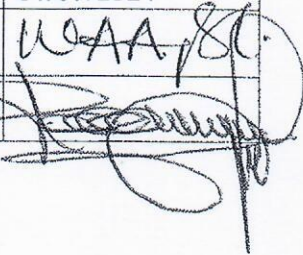
The investigation may include:

- Interviews with the person against whom the complaint is made.
- Interviews with possible witnesses.

The nature of the complaint and the assessment by Human Resources will affect how each complaint is handled.

Any investigation will be approached in such a way as to grant both parties (complainant and accused) a fair opportunity to present each one's side of the issue.

Regardless of how the investigation is conducted, all discussions regarding the complaint and investigation should be documented.

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3.3 Complaint Withdrawal

The complainant may withdraw the complaint at any time during the process. If this is done, the reason for the withdrawal should be determined and documented.

The requirements to continue an investigation will be reviewed and will be discontinued if prudent to do so.

3.4 Resolution Process

Where an incident of harassment or discrimination is found to have occurred, it may be handled in several different ways.

Examples (which are not exhaustive) include:

- Counselling may be prescribed.
- A public or private apology may be required.
- An employee found to have committed an offence might be subject to disciplinary action. The severity of the discipline would depend upon a number of factors, including the nature of the offence, the interests of the victim and of others in the workplace.
- Education and/or training may be offered.

No record of the complaint will be placed on the personnel file of the complainant or any of the witnesses involved in the investigation. However, a record of any disciplinary measure will be placed in the personnel file of the employee found to have committed harassment or discrimination.

If the investigation concludes the allegation is unsubstantiated, no further action will be taken. However, frivolous or vindictive complaints may be treated as harassment.

3.5 Retaliation

Whether the complaint ended up being genuine or unsubstantiated, retaliation in any form against the complainant, the alleged harassed or discriminated person or a witness is unacceptable and will be dealt with and treated as harassment.