

# SUSTAINABILITY, GOVERNANCE & CORPORATE AFFAIRS

Policy No. CorpGovM-004-2024		
Reference:		
Code of Business Conduct and Ethics		
Effective Date:	Amended on:	
09.16.2024		

# ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

#### 1. POLICY STATEMENT

1.1 Belle Corporation ('Belle' or the 'Company') is dedicated to fostering a workplace where every individual is treated with dignity, respect, and fairness. We champion equal opportunities for all employees and applicants, and we condemn any form of discrimination or harassment. We believe that a diverse and inclusive environment enriches our company culture and empowers us to achieve our collective goals.

#### 2. OBJECTIVES

- 2.1 To cultivate a work environment where everyone is treated with respect and dignity. The policy emphasizes that every individual has the right to work in a professional setting that promotes equal opportunities and prohibits discriminatory practices, including harassment.
- 2.2 To ensure that all employees can operate in an environment free from unlawful harassment, discrimination, and retaliation. It aims to create a safe and inclusive workplace where employees feel secure and protected.
- 2.3 To prohibit different treatment based on protected characteristics. It explicitly forbids any form of unequal treatment concerning employment terms, conditions, privileges, and benefits based on factors such as sex, sexual orientation, ethnicity, age, social class, or any other protected characteristic.

#### SCOPES

- 3.1 This policy applies to all individuals associated with BELLE, including employees, directors and officers, contractors, vendors, clients, and visitors.
- 3.2 It covers all aspects of employment and interactions within the workplace and extends to work-related settings outside the office, such as business trips, conferences, and social events.

#### 4. DEFINITION OF TERMS

- 4.1 Discrimination: Any unjust or prejudicial treatment of individuals based on race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, marital status, or any other characteristic protected by law.
- 4.2 Harassment: Any unwelcome conduct, verbal or physical, that creates an intimidating, hostile, or offensive work environment. This includes but is not limited to sexual harassment, bullying, and any behavior that demeans or humiliates others.
- 4.3 Sexual Harassment: Any unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that affect an individual's employment, interfere with work performance, or create an intimidating, hostile, or offensive work environment.



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### 5. GENERAL GUIDELINES

#### 5.1 Prohibited Conduct

- 5.1.1 Discrimination: Any adverse action or treatment based on an individual's protected characteristics, including but not limited to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, marital status, or any other legally protected status.
- 5.1.2 Harassment: Any unwelcome conduct that creates a hostile, intimidating, or offensive work environment.
  - a. This includes verbal, physical, or visual conduct based on protected characteristics, as well as sexual harassment.
- 5.1.3 Sexual Harassment: Unwelcome sexual advances, requests for sexual favors, or other verbal, physical, or visual conduct of a sexual nature.
  - a. This includes quid pro quo harassment (where employment decisions are contingent on sexual favors) and hostile work environment harassment (where the conduct creates an intimidating or offensive atmosphere).
- 5.1.4 Retaliation: Any adverse action taken against an individual who reports discrimination or harassment, or who participates in an investigation related to such complaints.
  - BELLE strictly prohibits any form of retaliation against individuals who report discrimination or harassment or who participate in an investigation.
    - The Company encourage open communication and want everyone to feel safe in coming forward without fear of reprisal.

#### 6. REPORTING PROCESS

- 6.1 If an individual experience or witness any form of discrimination or harassment, the Company encourage individuals to report it promptly. They can report to any of the following through verbal or writing an incident report:
  - 6.1.1 Immediate Superior- the first point of contact should be the employee's immediate superior, unless the superior is involved in the alleged behavior.
  - 6.1.2 Human Resources (HR) Department- if the immediate supervisor is involved or the employee is uncomfortable reporting to them, the employee can directly approach the HR Department.



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- 6.1.3 Any member of management- Employees may also report incidents to any member of the management team if they feel more comfortable doing so.
- 6.1.4 Anonymous Reporting- Employees may also report incidents anonymously through the company's designated reporting channels for example through ethicscommittee@bellecorp.com.
- 6.2 All complaints will be treated with the utmost confidentiality and will be investigated thoroughly and impartially. BELLE is committed to taking swift and appropriate corrective action to address any violations of this policy.

#### 7. INVESTIGATION PROCESS

- 7.1 Upon receiving a report, HR will:
  - 7.1.1 Conduct a thorough and impartial investigation into the allegations.
  - 7.1.2 Protect the confidentiality of all parties to the extent possible, balancing the need to investigate and address the issue.
  - 7.1.3 After gathering information, HR shall than report to the Ethics Committee the initial investigation made and possible measures to be implemented. Ethics Committee are consisting of heads of the following departments:
    - a. HR
    - b. Internal Audit
    - c. Governance and Corporate Affairs
  - 7.1.4 Take appropriate corrective action if the investigation confirms a violation of this policy. This may include disciplinary measures up to and including termination of employment.

#### 8. TRAINING AWARENES

- 8.1 BELLE will provide regular training to all employees on discrimination and harassment prevention, reporting procedures, and their rights and responsibilities under this policy.
  - 8.1.1 Awareness campaigns will be conducted to reinforce the importance of maintaining a respectful workplace.

#### 9. MONITORING AND REVIEW

9.1 This policy will be reviewed periodically to ensure it remains current and effective. Feedback from employees and legal developments will be considered during the review process.



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Prepared by

Recommended by

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