

Workplace Harassment Policy

1. Overview and Purpose

Our anti-harassment policy expresses our commitment to maintain a workplace that's free of harassment, so our employees can feel safe and happy. We will not tolerate anyone intimidating, humiliating or sabotaging others in our workplace. We also prohibit wilful discrimination based on age, sexual orientation, ethnicity, racial, religion or disability.

2. Scope

This policy applies to all EFD employees (permanent, contract and temporary), contractors, consultants and all other workers in the company and its subsidiaries, including all personnel affiliated with third parties.

3. Policy

3.1 Definition of Harassment in the Workplace

Harassment includes bullying, intimidation, direct insults, malicious gossip and victimization. We can't create an exhaustive list, but here are some instances that we consider harassment:

- 3.1.1 Sabotaging someone's work on purpose.
- 3.1.2 Engaging in frequent or unwanted advances of any nature.
- 3.1.3 Commenting derogatorily on others' ethnic heritage or religious beliefs.
- 3.1.4 Starting or spreading rumors about a person's personal life.
- 3.1.5 Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job against their will.

3.2 Addressing Harassment

If you're being harassed, whether by a colleague, customer or vendor, you can choose to talk to any of these people

3.2.1 **Offenders.** If you suspect that an offender doesn't realize they are guilty of harassment, you could talk to them directly to resolve the issue. This tactic is appropriate for cases of minor harassment e.g. inappropriate jokes between colleagues etc. Avoid using this approach with customers or stakeholders.

3.2.2 **Your manager.** If customers, stakeholders or team members are involved in your claim, you may reach out to your manager. Your manager will assess your situation and may contact HR if appropriate.

3.2.3 HR Department. Feel free to reach out to HR in any case of harassment no matter how minor it may seem. For your safety, contact HR as soon as possible in cases of serious harassment e.g. sexual advances, or if your manager is involved in your claim. Anything you disclose will remain confidential.

4. Policy Compliance

4.1 Compliance Measurement

The Group will verify compliance to this policy through various methods, including but not limited to feedback to the policy owner.

4.2 Exceptions

Any exception to the policy must be approved by the policy owner in advance.

4.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment. We may take legal action in cases of any unlawful behavior.