



Equal Opportunity Policy

1. BACKGROUND

Committed to making a difference for the better of our people, **Harel Mallac** shall apply the **Equal Opportunity Policy** in all its business units with a view to minimise the risk of employees being discriminated against and in order to promote recruitment, training, selection and employment on the basis of merit; and to take all necessary measures as may be required to ensure that working conditions are suitable for women and men, in line with current legislation and code of practice.

Based on our purpose and guiding principles that define ‘how we do business’, **Harel Mallac** endeavours to being an organisation where employees shall make full use of their talents, skills, experience and competence and where the employees shall receive equal treatment, feel respected, recognised for their effort & commitment and valued regardless of their status, including inter alia their age, caste, colour, creed, ethnic origin, impairment, marital status, political opinion, race, sex or sexual orientation.

2. PURPOSE AND SCOPE OF THE POLICY

This policy shall apply to Harel Mallac group and its subsidiary companies.

3. DEFINITION AND ABBREVIATION

Discrimination	refers to any different treatment to a person attributable wholly or mainly to his/her respective description by age, race, colour, caste, creed, sex, sexual orientation, HIV status, religion, political opinion, place of origin, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment
Employee	Includes part-time, full-time, permanent and casual employees, from trainees, operatives to Management
Employer	Refers to Harel Mallac and its business units
Harassment	means any unwanted conduct, verbal, non-verbal, visual, psychological, sexual or physical, based on age, disability, HIV status, domestic circumstances, sex, sexual orientation, race, colour, language, religion, political, trade union or other opinion or belief, national or social origin, association with a minority, birth or other status, that a reasonable person would have foreseen that an employee would be affected negatively in his/her dignity;
Head of Business unit	includes any person in charge of a HM company. Refers to but is not limited to a Managing Director, a General Manager and a Manager.
HM	Harel Mallac
HR	Shall be the Human Resources person in charge of the business unit or of the group as the case may be

4. REFERENCES

Equal Opportunity Act 2008
Employment Rights Act 2008
Employment Relations Act 2008
Harel Mallac Code of Ethics

5. RESPONSIBILITIES AND ACCOUNTABILITIES

It is the responsibility of all Heads of HM business units and the Group Head of Human Resources to ensure this policy is respected and adhered to.

Management teams & HR within each business unit shall ensure that their employees are aware of and comply with the policy.

6. HR PRACTICES

Harel Mallac shall:

- Ensure that no employee shall receive less favourable treatment and that opportunities for employment, training, promotion and transfer are accessible to all eligible candidates irrespective of their status.
- Undertake that selection for employment, promotion, transfer and training as well as access to benefits, facilities and services will be on a fair and equitable basis and shall be based solely on merit.
- Ensure that no form of discrimination (direct, indirect or by victimisation) or harassment (verbal or non-verbal/visual, psychological or physical) shall be tolerated.

7. IMPLEMENTATION OF THE POLICY

Guided by its commitment, Harel Mallac will take the following measures to implement this policy:

- ❑ Managers and employees in key decision-making areas will be trained on the policy and on discriminatory effects that certain provisions, practices, requirements, conditions and criteria can have on employees and the importance of being able to justify decisions to apply them.
- ❑ Opportunities for employment, promotion and transfer will be communicated internally and externally as far as practicably possible. Selection criteria will be entirely related to the job requirements and candidates will be considered solely on the basis of merit.
- ❑ Training and development opportunities will be provided to employees on the basis of performance assessment, employees' development and/or improvement needs and as per the organisation's priorities and requirements.
- ❑ Grievance, disciplinary action, performance appraisal and termination of employment will be monitored in line with the Company's rules and regulations.

- 7 Any grievance raised as a result of discrimination or harassment, founded on reasonable grounds, will be investigated. Any employee found guilty thereof will be subject to appropriate actions internally.
- 7 Requirements, conditions, provisions, practices and procedures in place will be regularly reviewed and revised with a view to eliminating any form of discrimination at work.

8. AWARENESS AND COMMUNICATION

- 7 The policy will be posted on the
 - 7 organisation’s website for the information of all job applicants.
 - 7 Group’s intranet, Edith for the information of all employees.
- 7 Job advertisements will state that HM is an equal opportunity employer.
- 7 All employees will be trained on the policy; on their rights and responsibilities under the policy, and on how the policy will affect the way they carry out their duties and also what constitutes acceptable and unacceptable conduct in the organisation.

9. COMPLAINTS AND REPORTING

Any person, including but not limited to an employee, a customer, a supplier or a partner, who feels that they have been the subject of or a witness to, an act of discrimination or harassment by any employee of Harel Mallac, during his or her work, should immediately report the incident to either his/her Head of Department or the Human Resources Department.

The person shall be responsible to report the instance in good faith.

Should an employee feel that he/she cannot report any act of discrimination or harassment to the Head of Department or the Human Resources Department, the employee may contact the Group Ethics Officer in accordance with HM Code of Ethics.

All complaints will be treated confidentially.

Any employee found guilty of non-compliance to the policy, shall be subject to disciplinary actions which may lead to termination of employment.

Issued by	Group Head of Human Resources	Approved by	Chief Executive Officer & HM Board
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