

## LASCAR ELECTRONICS ANTI-DISCRIMINATION AND HARASSMENT POLICY

### 1. Introduction

#### **Purpose**

This Anti-Discrimination and Harassment Policy is a guide for Lascar Electronics employees to ensure that the Company promotes equality and diversity, and maintains a work environment in which people are treated with dignity, decency, and respect.

Lascar Electronics will not tolerate harassment or discrimination in any form. Guidelines within this policy will help employees distinguish between appropriate and inappropriate workplace behaviour.

#### **Scope**

This Anti-Discrimination and Harassment Policy applies to all Lascar Electronics employees regardless of employment agreement, rank, or location. It also applies to vendors and third parties providing materials and services to the Company, such as consultants, agents, advisors, institutions and others acting on the Company's behalf. Third party affiliates are also responsible for reporting any violations of this policy they observe in dealings with the Company.

This policy applies to all areas of employment including, but not limited to; recruitment, promotions, training and development, remuneration, Company benefits and termination.

### 2. Responsibility

#### **Management**

Senior Leaders, Directors, Managers and Supervisors have a duty of care to look after the wellbeing of staff and are expected to:

- ensure that the workplace is free from all forms of discrimination, bullying and harassment
- treat any enquiry or complaint in a reasonable and respectful manner and to safeguard against retaliation and victimisation
- make recruitment and selection decisions based on merit
- consider flexibility in working arrangements, especially where needed to accommodate family responsibilities, disability, religious beliefs or culture

#### **Employees**

All employees are expected to:

- follow the standards of behaviour outlined in this policy
- offer support to people who experience discrimination, bullying or harassment
- avoid gossip and respect the confidentiality of complaint procedures
- treat everyone with dignity, decency and respect

Employees should remember that bullying and harassment is about how an individual is made to feel. Everyone is different, and what may be acceptable to one person may be offensive or improper to someone else.

### 3. Categories

#### **Discrimination**

Lascar Electronics has zero-tolerance towards discriminatory treatment, based in whole or in part, of an individual's protected characteristics including; race, colour, ethnic or national origin, age, religion, belief, disability, pregnancy or maternity status, gender, sexual orientation, gender reassignment, gender identity and expression, marital or civil partnership status.

#### **Harassment**

Lascar Electronics has zero-tolerance of any form of harassment. Harassment is any verbal, nonverbal or physical conduct that causes distress or alarm. Harassment within the workplace may be designed to threaten, intimidate, insult, degrade, humiliate, offend, bully, coerce, or damage the reputation of an employee, colleague, or any person working for or on behalf of the Company.

Verbal harassment includes comments that are offensive or unwelcome regarding an individual's protected characteristics. This includes epithets, slurs and negative stereotyping.

Nonverbal harassment includes distribution, display or discussion of any written or graphic material (including social media), that ridicules, denigrates, insults, belittles or shows hostility, aversion, or disrespect toward an individual or group because of their protected characteristics.

#### **Sexual Harassment**

Lascar Electronics has zero-tolerance of any form of sexual harassment. Sexual harassment includes unwelcome sexual advances (including verbal and physical advances), requests for sexual favours, and other verbal or physical advances or behaviour of a sexual nature. Sexual harassment occurs when it:

- Is made explicitly or implicitly a term or condition of employment
- Is used as a basis for an employment decision
- Unreasonably interferes with an employee's work performance or creates an intimidating or hostile environment

Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats, and requests for any type of sexual favour (this includes repeated, unwelcome invitations or requests for dates).

Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material that is sexually suggestive or shows hostility towards an individual or group because of their sex. Unsuitable materials may be in the form of letters, notes, photos, messages, social media posts, calendars, posters and cartoons. Suggestive or insulting sounds include leering, staring, whistling and obscene gestures.

Physical sexual harassment includes unwelcome physical contact. This may take the form of touching another person's clothing, hair, or body, tickling, pinching, patting, hugging, cornering, kissing, or a forced sexual assault.

### **Bullying**

Lascar Electronics has zero-tolerance of any form of bullying. Bullying includes unwelcome behaviour from a person or group that is either:

- offensive, intimidating, malicious or insulting
- an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone

Bullying might be a regular pattern of behaviour or a one-off incident. It may not always be obvious or noticed by others and could happen face-to-face, on social media, in emails or calls. Some examples of bullying include, but are not limited to:

- spreading malicious rumours about someone
- consistently putting someone down in meetings
- deliberately giving someone a heavier workload than everyone else
- excluding someone from team social events
- someone consistently undermining their manager's authority

### **Victimisation and non-retaliation**

Lascar Electronics will not tolerate any kind of negative actions taken against individuals raising concerns or filing a complaint relating to discrimination or harassment.

Victimisation in the workplace occurs when someone is subject to a detriment because they have brought, or it is believed they are about to bring, or support, a claim relating to discrimination or harassment. Retaliation in the workplace occurs when an employee experiences negative consequences of them raising, or supporting, a formal complaint. Making a formal complaint of discrimination or harassment is a protected activity, and the Company will deal with all complaints appropriately and with confidentiality.

## **4. Training**

Lascar Electronics will provide relevant Anti-Discrimination and Harassment training to Company management and staff as is deemed necessary and required by national, regional or local laws. This may include Unconscious or Implicit Bias training if considered beneficial to specific circumstances.

## **5. Diversity and Inclusion**

Lascar Electronics is an equal employment opportunity employer that recognises the benefits of diversity and inclusion within the workplace and is committed to providing a working environment that is free of discrimination.

## 6. Reporting Concerns and Disciplinary Actions

Violations of this policy can result in serious consequences for Lascar Electronics that damage its image, credibility and business associations.

Employees are encouraged to report any violations promptly. Reports should be made to the employee's Supervisor or Manager, or elsewhere as the circumstance dictates. The Company will respect all concerns and complaints and guarantee confidentiality. The Company will investigate all reported instances of discrimination or harassment and take necessary remedial action or disciplinary measures up to and including termination of employment.