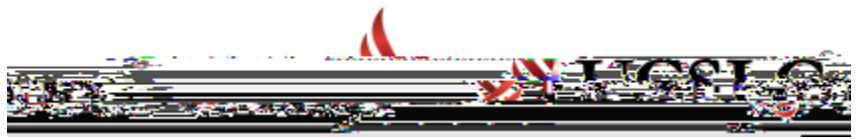




SEXUAL HARASSMENT POLICY

Purpose

This policy is a document that prohibits sexual harassment



2.2 Sexual harassment encompasses various conducts of a sexual nature which can manifest themselves in five possible forms, namely:

2.2.1 Verbal Harassment

e.g. offensive or suggestive remarks, comments, jokes, jesting, kidding, sounds, questioning.

2.2.2 Non-verbal/Gestural Harassment



of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc.

3.2 When a designated person receives a complaint of sexual harassment, he/she will:

- ◁ immediately record the dates, times and facts of the incident(s).
- ◁ ascertain the views of the victim as to what outcome he/she wants.
- ◁ ensure that the victim understands the company's procedures for dealing with the complaint.
- ◁ discuss and agree on the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome.
- ◁ keep a confidential record of all discussions.
- ◁ respect the choice of the victim.

3.2.1 Informal Complaint

If the victim wishes to deal with the matter informally, the designated person will:

- ◁ give an opportunity to the alleged harasser to respond to the complaint.
- ◁ ensure that the alleged harasser understands the complaints mechanism.
- ◁ facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant.
- ◁ ensure that a confidential record is kept of what happens.
- ◁ follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped.
- ◁ ensure that the above is done speedily and within 14 days of the complaint being made.

3.2.2 Formal Complaint

The designated person who initially received the complaint will refer the matter to the Vice President of Group Human Resources or the Vice-Chancellor and Group CEO to instigate a formal investigation. The designated person may deal with the matter him/herself or refer the matter to an internal investigator.

