

DAGON INTERNATIONAL LIMITED

WORKPLACE HARASSMENT POLICY

1. Our Code of Conduct requires to respect and honor the human rights of people involved in our business and, in particular, do not use or tolerate any form of harassment, bullying and violence.
2. Accordingly, the purpose of this policy is to provide a physically and mentally safe and secure work **environment** for all workforce members protecting from various forms of harassment.

Scope of the Policy

3. Anyone can be a victim of harassment, without consideration for their sex and of the sex of the harasser. The harassment may also occur between people of the same sex. The harasser does not necessarily have to have power or authority or influence over the victim. Harassment can occur from co-worker to coworker, supervisor to employee, employee to supervisor, employee to customer/vendor and customer/vendor to employee.

Harassment

4. For the purposes of this policy; the harassment is defined as any physical or verbal behavior or practice of any work force member of Dagon Group of Companies including employees, manager, volunteers, interns, trainees, working full time or part time, customers and vendors aimed at causing physical, psychological, sexual or economic harm to a person or group of persons staying or working internally or externally including visitors, and clients at the workplace.

Examples of Harassment

5. Some examples of workplace harassment are:

- physical advancement unwanted or unwelcomed by a person;
- unwelcome conduct of a sexual nature which a person can be offended, humiliated and/or intimidated;
- display or sending of sexual comments, stories and jokes, sexually explicit or suggestive materials, sexually-suggestive gestures;
- whistling, gossiping, spreading rumour and false allegation;
- discrimination based on race, colour, national origin, gender, pregnancy, religion, disability, age, genetic information, gender identity, marital status, sexual orientation, [HIV/AIDS]* and [political ideology]*;

(These words[---]* are proposed to add in accordance with the provision of The Dagon Group's Policy on Human Rights and Labour Standards.)

- physically or verbally abusive behaviour including yelling, insults, ridicule to humiliate or intimidate or depress someone and name calling;
- discouraging an individual's legitimate efforts for promotions or salary raise or transfer or staff development opportunities;
- forcing someone to violate the laws and regulation;
- work place pranks, -vandalism and hazing;
- setting impossible goals and expectations without fulfilling the requirement and facilities;
- forcing to work in a unhealthy and unsafe conditions, such as poor ventilation and noises;
- sabotaging someone else's work:

Example of Non-harassment

6. Staff development and regulatory **management** actions, including:

- imposing discipline for workplace infractions;
- conducting performance assessment;
- requesting documents as may be required in the normal office work process.

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7. Behaviors caused unintentionally or accidentally, and stopped immediately when it was noticed or communicated that the behavior is causing nuisance to someone or unwelcomed or unwanted by someone.

WorkPlace

8. The workplace is defined as all public and private places such as parlour, common room, dining hall, toilet, washroom, changing facilities, staff housing, vehicles, lift, training room, **gymnas~**, sport ground, and hotels used by **th~** victim for work or company related purposes. . ~ .'

9. Harassment that occurs outside the normal workplace and normal working hours but which has a negative impact on the working relationships, may also be considered harassment in the workplace.

Grievance Procedure for harassment

10. The following steps will be taken in the settlement procedure for the complainant:

(a) Firstly, the employee has to raise the complaint with the immediate supervisor or HR Department in person or in writing. [In the case of customers or business partners, the complaint should be communicated to the immediate supervisor or HR Department;]*

(to insert this new sentences [---]*as a requirement to protect the customers and vendors.)

(b) The immediate supervisor or HR representative will arrange a meeting as soon as possible depending upon the urgency of the case within 24 hours from the time receiving the complaint;

(c) The meeting will be held in a secure and quiet place without interruption from the surrounding;

(d) In the course of meeting, the immediate supervisor or HR representative will be assisted by a junior staff member for record keeping and the employee may be accompanied by a fellow worker;

(e) The supervisor or HR representative will carefully listen to the grievance of the victim and ask questions and may invite other persons involved and ask them for obtaining the facts;

(f) The complainant may also present the evidence as he or she thinks it necessary;

(g) After sufficient hearing and discussing with the victim, the supervisor or HR representative will report his comments and suggestions on the grievance to the Director (Administration) within 72 hours after the meeting who will make the decision and communicate it to the victim.

Referral to higher level meeting

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11. The case will be referred to a meeting with a more senior supervisor or divisional director when the immediate supervisor or HR representative thinks that it should **b~ s~Uleu** at the higher level given the nature and seriousness of the problem. The complaint will be investigated and reviewed taking sufficient time **b-fore** the previous decision is revised or approved. At that meeting, the HR representative will be present. The similar" referral will be made when the victim request or insist. The case will be decided within seven working days with the approval of the Director (Administration) after receiving it at the higher level meeting.

Referral to Contact Point

12. The complainant who is dissatisfied with the resolution of the higher level meeting resort to the Contact Point designated for employee matters where the grievance may be filed by email or telephone or in person. At this stage, the Contact Point Official designated to deal with the victim will take notes of the problem and reply to the complainant immediately if he or she has answer on hand. In some cases, the Contact Point may need more time to review the question and to find more facts and may decide to refer the case to the third party or the Workplace Coordinating Committee where the labour laws issues are involved.

Rights of the Accused

13. The decision maker has to treat both accused and complainant fairly. The accused must be given the right to explain in writing and present the evidence as he or she thinks it necessary. The thorough investigation will be required before the final decision is made and disciplinary action will be taken if the complainant made a false claim.

Corrective Action

14. The corrective action will be taken for both violation of harassment or false accusation of harassment. The level of the action [for employees]* will be first reprimand in writing, second reprimand in writing,

[thirdly]" the requirement to sign the bond, and [finally]* the removal from the employment depending on the nature of infringement as provided in the Employment Contract. [The verbal warning may be introduced for the minor harassment when the complainant is satisfied.]** .

(to add these words[---]* to separately express the corrective action for employees)

(to delete this sentences [---]** since the new Paragraph 16 will provide the verbal warning for

both employees and non- employees)

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[15. After receiving a complaints or report that a customer / vender engages in harassment, the company will responsibly respond to protect the employee in a reasonable way without damaging its image and future business prospect of the company. The remedial action may include asking the customer to correct the behaviour, refusing access to the company premises, communicating the employer of the customer for remedial action, suspending the business activities until they change or quit their behaviour.]

(to insert this new Paragraph 15 [-])*as a requirement to separately express the corrective action for customers and venders.)

[1 o.The verbal warning may be sufficient for the minor case when the complainant is satisfied.]*

(to insert this new Paragraph 16 [---]*in addition to Paragraphs 14 and 15 to cover both employees and non-employees.)

[*Confidmtiality*]

[17. Since the harassment is a sensitive and internal affair of the company, the confidentiality must be maintained througlrout the investigation process. In making the case public in response to the requirement of the stakeholders such as the wnummity and meilia, the personal details of the individuals should not be disclosed and the care must be:: taken to respect the privacy und wishes of the victim who may prefer a complete confidentiality.]

(to insert this new Paragraph 17 for the purposes of confidentiality and privacy)

[*Training*]

[18. The company will provide the training and development programmes on harassment for all managers and employees.]

(to insert this new Paragraph 18 to acldress the importance of the training and development in this area)