

## **ANTI-DISCRIMINATION POLICY**

Recom Technologies companies including all subsidiaries, holdings, and affiliated entities ("Recom Technologies") is committed to promoting a working environment where employees are treated with mutual respect and to fostering diversity in the workforce.

#### **Policy**

This policy and procedure is designed to:

- Address Recom Technologies obligations to create a work environment that is free from unlawful discrimination where all workplace participants are treated with dignity, courtesy and respect.
- Help all team members understand what their rights and responsibilities are, with a clear and easy to follow process.

#### Purpose

This policy covers, but is not limited to:

- Conduct in the workplace and in situations where work is performed away from the workplace.
- Conduct in the provision of goods and services to customers.
- All aspects of the employment relationship from recruitment, throughout the period of an employee's employment (e.g. in the access an employee has to training, promotion, remuneration benefits etc.) to termination.
- Communication through email, text messaging and social media.
- Situations directly connected with employment such as work-related travel, business meetings, and social events.
- Conduct outside of working hours where the employee's conduct has an adverse impact on the organisation, the employment relationship or the workplace.

#### **Promoting Equality and Diversity**

Recom Technologies acknowledges that diversity in its workforce is a valuable asset, and strives to provide an inclusive work environment in which different ideas, perspectives, and beliefs are respected. All practices regarding hiring and other aspects of the employment relationship require that there be no discrimination because of race, color, religion, age, gender, sexual orientation, gender identity, national origin, disability, veteran status, genetic information, or pregnancy, and other factors that may be covered by applicable laws.

Employees are provided with reasonable accommodation for disability. In addition, employees or potential employees should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111).

# **Consequences of Policy Breaches**

Any employee found to have acted inappropriately or in a manner contrary to Recom Technologies's stated position in this policy, may be the subject of disciplinary action and if appropriate, termination of employment. Employees should also be aware that legal action can be taken against them personally if they discriminate against, harass, vilify, sexually harass, bully or victimise another person at work.

Mitigating factors such as personal circumstances, disciplinary and work history and work performance will be taken into account, but will not be decisive, in determining the appropriate disciplinary measures to be adopted.

Any breach of this policy by a contractor will be dealt with under the relevant contract of engagement and may result in termination of the contract.

Suppliers are expected to also seek to uphold anti-discrimination policy in their business practices, a violation of which may lead to termination of partnership.

### **Complaints of Discrimination**

We will treat seriously, and, where appropriate, will take action regarding all complaints of discrimination or harassment on any of the unlawful grounds made by employees, clients, tenants, contractors or other



third parties. All complaints will be investigated in accordance with our grievance or complaints procedure and the complainant will be informed of the outcome.

Employees, business partners, and all other stakeholders can report violations or indicate their suspicion by email at ethics-humanrights@recom-tech.com. In addition, employees can give feedback through the regular direct management and human resources channels.

Cases are investigated and, where breaches are found, appropriate actions and effective remedy are taken.

> **RECOM TECHNOLOGIES** Revised in December 2022

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