

HARASSMENT IN THE WORKPLACE POLICY

The most productive and satisfying work environment is one in which work is accomplished in a spirit of mutual trust and respect. Harassment is a form of discrimination that is offensive, impairs morale, undermines the integrity of employment relationships and causes serious harm to the productivity, efficiency and stability of an organisation.

In general, harassment means persistent and unwelcomed conduct or actions. Sexual harassment is one type of harassment and includes unwelcomed sexual advances, physical contact of a sexual nature or verbal exchange of a sexual nature.

It is the policy of Samchem Group of Companies to prohibit any form of harassment in the workplace. The objective of this policy is to provide a work environment that fosters mutual employee respect and working relationships free of harassment.

Under the Company's policy, harassment is any inappropriate conduct which has the purpose or effect of:

- Creating an intimidating, hostile, or offensive work environment;
- Unreasonably interfering with an individual's work performance; or
- Affecting an individual's employment opportunity.

Harassment will not be tolerated. Harassment may be subtle, manipulative and is not always evident. It refers to behaviour that is not welcomed and is personally offensive. All forms of gender harassment are covered. Men can be sexually harassed; men may be harassed by other men. Women may be harassed by other women. Offenders can be directors, managers, supervisors, co-workers, and non-employees such as clients or vendors. All employees will be subject to disciplinary action, including termination for any act of harassment.

Individuals who believe they have been subjected to harassment should immediately report the incident to their supervisors, higher management, or the Manager, Human Resources Department. All complaints will be promptly and thoroughly investigated.

Employees or supervisors who observe or become aware of harassment should immediately inform their supervisors, higher management, or the Manager, Human Resources Department. No employee should assume that the Company is aware of a problem. All complaints and concerns should be brought to management's or the Human Resources Department's attention so that appropriate corrective steps can be taken.

No retaliation will be taken against any employee because he or she reports a problem concerning possible acts of harassment. Employees can raise concerns and make reports without fear of reprisal. Questions about what constitutes harassment behaviour should be directed to the employee's supervisor or Human Resources Department Manager.

The Human Resources Division is responsible to ensure that this Policy is understood by all, is also responsible for conducting an investigation when required and in reviewing this Policy so that the aims of this Policy are achieved.

The CEO has the responsibility of taking the lead in promoting a harassment free workplace.