POLICY NAME	EQUAL OPPORTUNITY & ANTI-HARASSMENT POLICY
POLICY OWNER	DIRECTOR – GROUP HUMAN RESOURCES
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MAS
CHANGE IS COURAGE

EQUAL OPPORTUNITY & ANTI-HARASSMENT POLICY

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1.0 PURPOSE

1.1 MAS is committed to promote an environment free of discrimination and harassment, in which decision-making with regard to all persons, is based on business needs, job requirements and individual merit.

1.2 All persons are required to maintain a work atmosphere free of discrimination and harassment, by treating others with dignity and mutual respect. Persons engaging in discriminatory conduct or harassment will be subjected to disciplinary action, up to and including termination of employment.

2.0 SCOPE

2.1 The policy applies to all MAS employees, trainees, interns, job applicants, advisors, customers, suppliers, strategic partners, and visitors, while executing duties for, or engaging with MAS within and outside its company premises.

3.0 UNDERSTANDING DISCRIMINATION AND HARASSMENT

3.1 What is discrimination?

3.1.1 Discrimination involves treating or proposing to treat an individual or group unfairly and/or unfavourably, based on distinguishing characteristics which are not related to the job.

3.1.2 Such distinguishing characteristics may include, but are not limited to race, colour, nationality, religious beliefs, social status, gender, gender identity and/or expression, sexual orientation, age, marital or domestic partnership status, pregnancy, medical status, family medical history or genetic information, family or parental status, disability, physical appearance, past or present military service, political opinion or position held in the company. These characteristics are not exhaustive and can be added on to, in accordance with the local and international laws applicable to countries which MAS operates in.

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3.1.3 Discrimination can occur directly or indirectly:

a. **Directly –** when a person or group is treated unfairly or unfavourably because of distinguishing characteristics.

E.g.: An individual of a certain nationality is humiliated due to his/her accent, or an employee not being granted a promotion due to his/her religion.

b. **Indirectly -** when an unreasonable requirement is imposed or practice is followed, which maybe disadvantageous to people with distinguishing characteristics.

E.g.: Males are promoted as CEOs since they are perceived to have less family commitments, which enables them to commit to long, undistracted hours at work.

3.2 What is harassment?

3.2.1 Harassment occurs when a person is treated unwelcomingly or differently or in a manner that makes the person uncomfortable by way of physical, verbal, or visual forms, which in turn creates an offensive, hostile, or intimidating work environment. Harassment can include a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in or are likely to result in physical, psychological, sexual, or economic harm and includes gender-based violence and harassment.

3.2.2 Harassment occurs in different forms and may include, but is not limited to:

a. Verbal conduct such as;

I. Unwelcome, unwanted, derogatory, or inappropriate nicknames, jokes, comments, questions, slurs, invitations, taunts or demands directly to an employee or about an employee to other employees

II. Teasing, bullying or humiliation

III. Manipulation of a person's personal or professional reputation by rumour, gossip, or ridicule

IV. Persistent and unjustified verbal abuse, intimidation, or threats

b. Physical conduct such as physical intimidation, assault, unwelcome or inappropriate physical contact

c. Visual conduct such as the display or dissemination of derogatory, demeaning, or hostile communication

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d. Written abuse containing demeaning language, images or visuals, intimidation or threats via emails, social media messages, text messages or any other form of written communication
e. Stalking
f. Abuse of power or authority
g. Unwarranted exclusion or responsibilities being withdrawn without valid reason
h. Unwillingness to train, evaluate, assist or work with a person
i. Mobbing
j. Act or conduct which is intimidating and creates a hostile environment at the workplace or outside in relation to MAS stakeholders

3.2.3 Affirmative Action

MAS regularly reviews its workforce to identify job categories in which a fewer proportion of minorities are employed in (*E.g.: women performing a job which is predominantly performed by men*). In the event MAS identifies underutilisation of resources, placement goals are established, which would focus recruitment and outreach efforts on the affected job categories. The MAS 'Women Go Beyond' programme and other programmes which aim to employ the differently abled and promote 'Women in Leadership', are few examples of such outreach efforts. Therefore, such affirmative action which aims to promote certain minorities does not amount to discrimination.

3.3 Sexual harassment

Sexual harassment constitutes any unwanted or unwelcome conduct of a sexual nature that creates an offensive, degrading or a hostile environment, which may occur in the form of physical, verbal, written, non-verbal or visual forms.

Such conduct may include (but not limited to)

3.3.1 Physical conduct

a. Physical contact including brushing against body, touching, patting, pinching, stroking, fondling, kissing, hugging
b. Physical violence including sexual assault or molestation
c. Obstructing or cornering

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3.3.2 Verbal conduct

a. Obscene comments, stories, jokes or name-calling
b. Requesting or demanding sexual favours, explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person in any company activity
c. Degrading or abusive remarks with a sexual overtone
d. Suggestive hints, invitations, or comments of a sexual nature (such as repeated and unwanted social invitations for romantic relationships or physical intimacy)
e. Comments or insults based on a worker's appearance, gender, sexual orientation, age, private life, etc.
f. Lewd comments

3.3.3 Non-verbal, visual and other forms of conduct

a. Sending sexually explicit messages by phone, email, or any other media
b. Staring, stalking, whistling, leering, ogling or other sexually coloured gestures
c. Sign language or hand signals denoting sexual activity
d. Use or display of pornographic material or other material of a sexual nature
e. Misuse of internet including circulation of obscene e-mails or any form of digital communication with a sexual overtone
f. Persistent flirting
g. Intruding upon one's privacy

3.3.4 At the workplace the sexual harassment occurs in two forms:

a. **Quid Pro Quo**

This type of sexual harassment at the workplace occurs by way of a direct threat or sexual bargaining by a person in a position of power connecting the threat or bargaining associated with:

I. Terms and conditions of employment (hiring, confirmation, transfer, promotion, retention etc.)

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II. Workplace prospects/rewards (accessing training opportunities, appraisals, bonus etc.). This is where such terms and conditions or prospects and rewards are offered and/or given based on or dependant on the employee providing sexual favours to the person in power. When a target of sexual harassment has no choice in the encounter or has reasons to fear the repercussions if he/she rejects the overture, the exchange has moved out of the domain of courtship or sociable interaction into an arena of intimidation and aggression

III. Consensual relationships of a sexual, romantic, or intimate nature between persons in an unequal power relationship (*E.g.: manager and subordinate*), which appear to be welcome and voluntary, may nonetheless constitute to sexual harassment if duress, abuse of power, or personal benefits could be established

b. **Hostile Working Environment**

This refers to any unwelcome physical approaches, speech, gestures or conduct of a sexual nature from superiors, co-workers, subordinates that could result in an abusive/hostile working environment. Boundaries of a work environment are not determined by physical location. Sexual Harassment can take place while executing duties for or engaging with MAS within and outside its company premises. Anyone can be a victim of sexual harassment, regardless of one's own or the perpetrators gender. MAS recognises that sexual harassment may occur between people of different genders or the same gender.

4.0 MANAGING NON-COMPLIANCE

4.1 In the event you are being discriminated or harassed, take following action:

4.1.1 Tell the alleged perpetrator his / her behaviour is unwelcome and ask him / her to stop, if you feel it is safe to do so (this action is recommended and not mandatory, subjected to safety reasons especially with regard to unequal power relationships).

4.1.2 Keep a record of incidents (dates, times, locations, possible witnesses, what happened and your response), as facts are important to file a complaint. A record can strengthen your case and help you remember details over time.

4.1.3 Speak with your HR representative or code officer to obtain support and/or report the incident via the online platform or hotline.

4.2 Bystander Intervention

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4.2.1 Bystander intervention is recognizing a potentially uncomfortable situation a colleague is in and creating an interaction and choosing to respond in a way that could break up or divert the uncomfortable interaction.

E.g.: You are at the company party, and you see a female colleague in conversation with a more senior male colleague. You can hear the male colleague asking some personal questions from the female colleague and she looks visibly uncomfortable. You decide to join the conversation and ask for them if they would like a drink or something to eat and start a different conversation with the senior male colleague.
This breaks up an uncomfortable interaction and this allows the female colleague to excuse herself.

4.2.2 Bystander interventions are optional or voluntary steps that maybe taken by employees. Action shall be taken against alleged perpetrators for all forms of harassment regardless of bystander intervention.

4.2.3 A bystander may make a complaint to the HR team, Code Officers or via the MAS DNA Helpdesk or Hotline on behalf of the affected party or separately as an observer for the information of the company. (consent of the aggrieved party is not necessary for the bystander to make a complaint, but is necessary for a sexual harassment inquiry)

4.3 Report discrimination or harassment via one of the following channels:

4.3.1 Speak to your SBU, Divisional or Group Code Officer or HR representative.

4.3.2 Lodge a complaint via the DNA Helpdesk /DNA Hotline

a. Log on to masdnahelpdesk.ethicspoint.com

4.4 When a complaint of discrimination or harassment is reported to the Central DNA team, respective Code Officer / HR, they will:

4.4.1 Immediately record the concern, including dates, times, and facts of the incident/s and obtain written statements from the complainant.

4.4.2 Ascertain the views of the affected person and the desired outcome. The choice of the affected person will be respected at all times.

4.4.3 Ensure the affected person understands and agrees with the company's procedures (In the event the complainant/aggrieved party does not wish to proceed with the complaint at any stage of the investigation process, a written statement will be obtained from the complainant).

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4.4.4 Interview the affected person, alleged perpetrator, and other parties separately and obtain statements in writing.

4.4.5 Produce a detailed report on the investigation.

4.4.6 Based on the investigation report, the investigation team determines whether or not the incident/s of harassment/discrimination reported, amount to a prima facie case to pursue the matter.

4.4.7 If a prima facie case is deemed to exist, issue a show cause letter to the alleged perpetrator.

4.4.8 Determine if any temporary remedial action/extra safeguards have to be taken on behalf of the affected person and it shall be done in consultation with the affected person (E.g.: a change of working arrangements for the affected person of s/he so desires).

4.4.9 Based on the explanation received from the alleged perpetrator to the show cause letter, determine whether a domestic inquiry or further inquiry is required. (It is recommended to hold a domestic inquiry when the alleged perpetrator has denied the charges in to or has forwarded a conditional plea of guilty in respect of the charges levelled against the alleged perpetrator in the show cause letter issued).

4.4.10 Following the conclusion of the inquiries, action must be taken in accordance with the MAS Consequence Management Framework (*E.g.: Final warning, withholding of discretionary pay, termination*).

4.4.11 Follow-up to ensure the recommendations are implemented, the inappropriate behaviour has stopped, and the affected person is satisfied with the outcome.

4.4.12 Keep a record of all discussions and actions and ensure the confidentiality of such records.

4.4.13 Ensure the disciplinary process is completed promptly as practically possible without any undue delays.

4.5 Complaints will not be dismissed or downplayed under any circumstance. The Central MAS DNA Team, respective Code Officers, HR, and other accountable parties will maintain the confidentiality of all parties involved in the recording and investigation of the complaint.

4.6 It is your responsibility to support ongoing investigations by being open, honest, and maintaining confidentiality, in the event you are contacted by a member of the Central MAS DNA Team, respective Code Officer and/or HR.

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4.7 Retaliation against an individual for lodging or attempting to lodge a complaint and supporting a affected person or participating in investigations, amounts to non-compliance of The MAS DNA (Code of Conduct) and the policy. Penal sanctions may be applicable in the event the offence is covered under the Penal Code of Sri Lanka.

4.8 Reporting unfounded false allegations with wrongful intentions of malice, in a bid to tarnish reputations, amounts to non-compliance of The MAS DNA.

4.9 Non-compliance of the policy will be addressed by the Central MAS DNA Team, respective Code Officers, and/or HR, based on guidelines set in the *MAS Consequence Management Framework.* Persons who are found to have violated the policy will be subjected to disciplinary action up to and including termination of employment.

5.0 RESPONSIBILITY

Party Responsible	Actions
MAS Apparel Board	• Approval and sign-off
Director - MAS Group Human Resources	• Ownership and authority to make amendments
MAS Governance Structure	• Addressing non-compliance
Code Officers / HR	**Monitor Compliance** • Ensure the respective unit adheres to the policy and provide further support if and when required **Manage Non-Compliance** • When a case of harassment is brought up, ensure that he/ she is comfortable with you handling the case • Ensure the investigation team includes at least one person of the same gender as the affected person • Record and investigate all violations in a timely manner **Sustainability** • Ensure to regularly communicate and have educative sessions within the respective units on the Equal Opportunity and Anti-Harassment Policy, by utilizing the resources provided by the Corporate Group HR team • Work with HR to ensure new recruits receive mandatory education about the importance of training on and adhering to the policy • Liaise with Group HR and provide regular feedback on the policy and process via policyinfo@masholdings.com

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Line Managers	**<u>Educate</u>** • Educate your team on the Equal Opportunity and Anti-Harassment Policy **<u>Adherence</u>** • Ensure to be aware of your team aligns with the policy • Refrain from discriminating anyone based on characteristics not related to the job **<u>Discuss</u>** • Have an annual mid-year discussion with the team emphasizing the importance of adhering to the policy **<u>Manage Non-Compliance</u>** • In the event you notice and/or are made aware of a situation of harassment or discrimination, ensure to bring it to the immediate attention of an SBU/ Divisional/ Group Code Officer or via the DNA help desk
Employees, advisors, customers, suppliers, strategic partners, visitors	**<u>Adherence</u>** • Read, understand and comply with the Equal Opportunity and Anti-Harassment Policy • Keep in mind to trust and mutually respect everyone, equally • Refrain from bullying, abusing, or treating anyone unfairly **<u>Managing Non-Compliance</u>** • Report any activity that may not comply with the MAS the Equal Opportunity and Anti-Harassment Policy to an SBU/ Divisional/ Group Code Officer or via the DNA Help Desk Website or DNA Hotline • In the event you are asked to support an ongoing investigation; be open, honest and maintain confidentiality to conduct an effective investigation • If in doubt regarding the policy, contact Group HR on **<u>policyinfo@masholdings.com</u>**

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6.0 DEFINITIONS

Advisors	External consultants, non-executive directors, and advisory board members.
Customers	All MAS customers and their agents.
Employees	Permanent employees (full-time, part-time, and casual) and non- permanent employees (*E.g.: on probation, consultants, interns and trainees*) engaged with MAS under contractual terms or letters of engagement.
Gender identity and expression	A person's identification and expression as a male, female or other, which may or may not correspond to their designated gender at birth.
MAS	MAS Holdings (Private) Limited and its subsidiaries, affiliates, and joint venture companies.
MAS SBU	A subsidiary or affiliate of MAS, regardless of whether the business unit is a registered legal entity or an unregistered unit in which business is conducted.
MAS Stakeholders	MAS stakeholders shall mean Shareholders, employees, customers, and suppliers of MAS
Person/s	Employees, advisors and third parties.
Suppliers	All suppliers, direct and indirect service providers, sub-contractors, and their agents MAS deals with.
Visitors	All business and individual visitors to MAS premises.
MAS Governance Structure	The Central DNA Team, appointed SBU, Divisional, and Group Code Officers.

Contact Us

If you have any questions with regard to the policy, please get in touch with your SBU, Divisional or Group Code Officers, or the DNA Helpdesk. We are happy to help you!

- ***Log on to*** *– masdnahelpdesk.ethicspoint.com*

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