



ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

1. Purpose

The purpose of this policy is to prohibit harassment and/or discrimination against employees of Demerara Distillers Limited (DDL). DDL believes that all employees have the right to work in an environment which is free from any form of discrimination and/harassment.

2. Scope

2.1 This policy applies to all employees of the company, while on company premise, or off-premise while conducting business on behalf of DDL or in any other work-related settings, including but not limited to business trips, office outings or work-sponsored events. . This policy also applies to communications and materials sent or received via phone, e-mail, social media or any other communication platform.

2.2 All third-parties are expected to support this policy.

3. Commitment

DDL is committed to ensuring that all staff operate in an environment free from discrimination and harassment; feel safe and are treated with dignity and respect.

4. Discrimination

4.1 Discrimination is unjust or unfair treatment metted out to different categories of people.

4.2 It is a violation of this policy to discriminate *against a fellow employee* on the basis of race, age, ethnic origin, colour, religion (creed), political conviction, gender, gender expression, marital status, disabilities, sex, sexual orientation or trade union membership in any of our activities or operations.

4.3 Discrimination of this kind is a breach of Section 4 of the Prevention of Discrimination Act Cap 99:09.

5. Harassment

5.1 For the purpose of this policy, harassment can be defined as unwelcome verbal or physical action directed towards an employee of DDL.

5.2 DDL prohibits harassment of any kind and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy.

5.3 Harassment involves subjecting an individual, whether male or female, to conduct which is unwanted and where the conduct has the purpose or effect of violating the victim's dignity, or creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.

5.4 Harassment can occur whether or not it is intended to be offensive.

5.5 Harassment may take a number of forms, including but not limited to: bullying, offensive or degrading remarks, insulting, teasing, mocking, degrading or ridiculing another person or group; racial slurs, derogatory remarks, unwelcome or inappropriate physical contact, comments, questions, advances, jokes, or demands; physical assault or stalking; displays or electronic transmission of derogatory, demeaning or hostile materials; and unwillingness to train, evaluate, assist, or work with an employee.

5.6 These activities may be directed at one or a number of people; and need not be directed at the complainant.

6. Sexual Harassment

6.1 Sexual harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature.

6.2 Sexual Harassment involves subjecting an individual to conduct which is unwanted and where the conduct has the purpose or effect of violating the victim's dignity, or creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.

6.3 Unwelcome conduct such as the following is inappropriate and a violation of this policy:

- a) Sexual pranks or repeated sexual teasing, jokes or innuendo, in person, via telephone, e-mail or over social media or any other form of electronic communication;
- b) Verbal abuse of a sexual nature;
- c) Unwanted sexual advances or propositions
- d) Repeatedly asking a person to socialize during off-duty hours when the person has indicated a lack of interest in doing so (this is particularly applicable to superiors and their subordinates);
- e) Giving gifts or objects to a fellow employee that are sexually suggestive;
- f) Physical acts of a sexual nature, such as: touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body; Rape, sexual battery, molestation or attempts to commit these assaults.
- g) The distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters, notes,

facsimiles, e-mails, photos, text messages, tweets and Internet postings; or other forms of communication that are sexual in nature and offensive.

- h) An employment decision affecting an employee is made because the individual submitted to or rejected unwelcome conduct
- i) The unwelcome conduct unreasonably interferes with an employee's work performance or creates an intimidating, hostile or abusive work environment
- j) Inferring or expressly stating that promotions, awards, training or other job benefits are conditional upon accepting unwelcome sexual behavior.

6.4 Sexual harassment is a form of unlawful employment discrimination under Section 8 of the Prevention of Discrimination Act Cap 99:09.

6.5 Sexual harassment may take different forms. The examples of sexual harassment set out in this policy are intended to be guidelines and are not exhaustive when determining whether there has been a violation of this policy.

7. Confidentiality

All complaints and investigations are and will be treated confidentially to the extent possible, and information will only be disclosed strictly on a need-to-know basis. The identity of the complainant will be revealed to the parties involved during the investigation, and the Human Resources Director will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the Human Resources Department.

8. Complaints

The DDL employee complaints procedure can be used or complaints can also be made directly to the Human Resources Manager. No hardship, loss, benefit or penalty may be imposed on an employee in response to:

- Filing or responding to a genuine complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.

9. Alternative legal remedies

Nothing in this policy shall prevent the complainant or the respondent from seeking any remedies available under the laws of Guyana or otherwise.