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HUMAN RESOURCE DEPARTMENT NON-DISCRIMINATION POLICY		APPROVED BY BOD

## 1. INTRODUCTION

Mya Ayer Group of Companies, are committed to a work environment in which all individuals are treated with respect and dignity and has developed this policy to ensure that all its employees can work in an environment free from unlawful harassment, discrimination and retaliation. Mya Ayer Group will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Any employee who has questions or concerns about these policies should talk with the Head, Human Resource. These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions.

This policy prohibits disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

### 1. Implementation of the Non-Discrimination Policy

#### (i) equal employment opportunity

This policy ensures equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law.

#### (ii) Retaliation

Mya Ayer Group, encourages prompt reporting of all perceived incidents of discrimination or harassment and prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

### (iii) Sexual harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

- a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
- b) Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.

c) Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender.

### (iv) Harassment

Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that:

- a) Has the purpose or effect of creating an intimidating, hostile or offensive work environment
- b) Has the purpose or effect of unreasonably interfering with an individual's work performance
- c) Otherwise adversely affects an individual's employment opportunities. Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by email, phone (including voice messages), text messages, social networking sites or other means.

## 2. Individuals and Conduct Covered

This Policy applies to all applicants and employees of Mya Ayer Group. Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

## 3. Reporting of instances

Mya Ayer Group encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor, the Human Resource Committee or even the Whistle Blowing Committee.

## 4. Complaint Procedure

Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor or Head of Human Resources.

Mya Ayer Group encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination, as Mya Ayer Group believes appropriate under the circumstances. If a party to a complaint does not agree with its resolution, that party may appeal to the company's Human Resource Committee or to the Managing Director or the Chief operating officer. False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.