



TERMINALS

Allcargo Terminals Limited

CIN: L60300MH2019PLC320697

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Anti-harassment and Anti-Discrimination Policy

Allcargo Terminals Limited (hereby referred to as “ATL”/ “The Company”) believes that all humans have the right to freedom from harassment and discrimination, where all individuals are treated with respect and dignity, and have equal opportunities. ATL is responsible to ensure that all its employees, customers, vendors, suppliers and other stakeholders feel included and are not discriminated against, while conducted business with us. This policy is to state ATL’s commitment towards maintain a zero tolerance approach to harassment and discrimination.

Purpose

ATL has a zero-tolerance policy towards any form on harassment or discrimination and will always strives to maintain an environment free of it. The policy intends to:

- ensure that all covered under this policy are aware that harassment and discrimination are unacceptable practices and are subject to legal action,
- assertion the minimum standard of behaviour expected of all covered under this policy,
- ensure prompt and fair dealing with complaints on harassment, bullying or any kind of unlawful discrimination by employees, suppliers, vendors and any other stakeholders,
- treat all employees fairly and have zero tolerance for discrimination,
- comply with all laws related to harassment, discrimination and equal opportunity.

Scope and Applicability

The Anti-Discrimination and Anti-Harassment Policy (hereafter referred to as “Policy”) is applicable to all employees, suppliers, vendors and contractors or any other individuals that conduct business (hereby referred to as “employees”) with ATL and its affiliates across all geographies.

It is necessary to note that jurisdiction and local regulations for harassment and discrimination may across countries and that this policy be used in conjunction with the local laws. However, if local regulations set a higher standard for than this policy, then local regulations are to be followed in addition to this policy.

Policy Statement

1. Prohibition of Harassment

For ATL, harassment includes, but is not limited to, any unwelcome conduct (verbal, nonverbal or physical) that has the purpose or effect of violating a person’s dignity, creating a hostile or offensive environment, or can reasonably be expected to cause an individual to feel uncomfortable, bullied, offended, denigrated, humiliated, intimidated, threatened, or distressed. The nature of harassment may be of sexual or non-sexual and is a violation of this policy.

Sexual harassment may be defined as any unwelcome acts or behaviour (whether directly or by implication) such as physical contact and advances, a demand or request for sexual favors, making sexually coloured remarks, showing pornography or any other unwelcome physical, verbal or non-verbal conduct of sexual nature. Cases of sexual harassment will also be dealt with under the POSH Policy of the Company. The standards of the POSH Policy must be upheld in conjunction with this

policy, irrespective of the location of our operations. This policy also prohibits sexual solicitation by any individual who is in a position to grant or deny a benefit to the recipient of the solicitation or advance. This includes managers and supervisors, as well as co-workers where one person is in a position to grant or deny a benefit to the other.

2. Anti-Discrimination

ATL prohibits discrimination, harassment, bias or prejudice in its terms and conditions of employment on the basis of an individual's race, colour, national origin/ancestry, ethnic origin, age, sex/gender (including intersex, transgender or intergender status), pregnancy, maternity, paternity or caring responsibilities, marital or relationship status or civil partnership, sexual orientation, gender/sexual identity or expression, physical/mental disability, creed, religion and religious affiliation, any other protected status under applicable local law. Discrimination on the basis of these aspects is a violation of law, and violators will face disciplinary action.

Any person who believes himself or herself to have been subjected to discrimination on the basis of the any of the characteristics mentioned herein is encouraged to bring the matter to the attention of the management at the earliest opportunity.

3. Dissemination and Implementation of Policy

Directors, Management Committee and Managers shall be responsible for implementing equal employment practices within each department. The Human Resources department shall be responsible for overall compliance and shall maintain personnel records in compliance with applicable local laws and regulations.

4. Disciplinary Action

All employees must be aware of their role and responsibility in maintaining an environment free of harassment and discrimination. The violation of this Policy is subjected to strict disciplinary action. Depending upon the severity of the offence and the reoccurrence of the incidents, offenders are subject to a verbal warning, written warning, loss of privileges, demotion, suspension, permanent termination of contract and/or criminal charges. The local laws and regulations of each operation's location will be taken into consideration as well. Filing of false reports, false testifying, intentional reputational damage and fabrication of such incidences will also be considered as a violation to this Policy.

5. Incident Reporting

ATL promotes a culture of openness and a strong speak up is a part of our ethos. All employees who may have faced harassment or discrimination, keeping this policy in mind, are encouraged to step forward and report such incidences. The anonymity and confidentiality of the reportee will be maintained at all times and will not be disclosed with the reportee's consent. Employees testifying for any incidences will also be protected under the reports anonymity and confidentiality clause. Such

incidents may be reported through the whistleblowing mechanism mentioned in the Whistleblowing Policy through email as mentioned below:

Whistleblowing mechanism:

By email: whistle.blower@allcargoterminals.com

6. Non-Retaliation

ATL ensures that no reportee faces retaliation from the offenders or the Company upon reporting of an incident. Reprisal or retaliation is strictly prohibited and is a violation of this policy.

7. Training for employees

The Learning and Development team shall conduct mandatory training programmes to promote a discrimination and harassment-free workplace on an annual basis. All employees are required to complete the training and affirm compliance.

Version	Effective Date	Description of changes
Version 1.0	5 th July 2023	Adoption of Policy at the Board Meeting held on 5 th July 2023