

## **SEXUAL HARASSMENT POLICY**

### **1. Purpose**

The purpose of this document is to outline EMIA's ("the Company") approach to provide a safe, respectful, professional workplace, free from discrimination on any grounds and from harassment at work including sexual harassment.

This policy is congruent with international arrangements, in particular with the Sustainable Development Goals, the International Labour Organisation's Convention 190 (international treaty to recognise the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment), and the applicable laws of the country where EMIA operates.

### **2. Commitments**

EMIA is committed to provide a safe, respectful, professional workplace, free from discrimination on any grounds and from harassment at work including sexual harassment.

EMIA will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence.

No one will be victimised for making such a complaint.

### **3. Complaints Procedures**

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. EMIA recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person is ESG & Sustainability Manager or CFO, or any other C-suite positions ("Designated Person").

When a Designated Person receives a complaint of sexual harassment, he/she will:

1. Immediately record the dates, times and facts of the incident(s).
2. Ascertain the views of the victim as to what outcome he/she wants.
3. Ensure that the victim understands the Company's procedures for dealing with the complaint.
4. Discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome.
5. Keep a confidential record of all discussions.
6. Respect the choice of the victim.
7. Ensure that the victim knows that they can lodge the complaint outside of the Company through the relevant country/legal framework.

### **4. Sanctions and Disciplinary Measures**

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

### **5. Monitoring and Evaluation**

On a yearly basis, ESG & Sustainability Manager will report on the compliance with this policy to the Board of EMIA, including the number of incidents, how they were dealt with, and any recommendations made. As a result of this report, the Company will evaluate the effectiveness of this policy and make any changes needed.