

## ANTI-HARASSMENT POLICY

PT Global Plastic Trading and Global Plastic Trading Pty Ltd (GPT) is committed to a work environment in which GPT directors, officers, employees, and participating member representatives are treated with respect and dignity. Persons have the right to work in a professional atmosphere that prohibits discriminatory practices, including harassment on the basis of race, colour, religion, age, sex, national origin or ancestry, veteran status, physical or mental disability, or other characteristics protected under applicable law. GPT prohibits bias, prejudice and harassment in the workplace.

This policy applies to all GPT employees, including management-level employees. However, this policy is not limited to interactions and relationships between and among employees. It also extends to interactions and relationships with directors, officers, participating member representatives, vendors, suppliers and any other business contacts during the course of GPT activities. This policy applies at GPT's headquarters and offices, and also to offsite company sponsored events, meetings, business travel, and any other locations where employees perform work for GPT.

It is GPT's policy to vigorously investigate reports of harassment and prohibit retaliation against individuals who report in good faith such an incident or participate in an investigation. If harassment is found to exist in the workplace, immediate and appropriate disciplinary action will be taken, up to and including termination of employment.

## SEXUAL HARASSMENT

Sexual harassment consists of unwelcome sexual advances, requests for sexual favours or other verbal or physical acts of a sexual nature where:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- An employment decision is based on an individual's acceptance or rejection of such conduct; or
- Such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

Sexual harassment also may include non-sexual behaviors such as verbal abuse that reflects harassment of an individual as a result of their sex or other status, regardless of whether sexual innuendo is used.

Sexual harassment may include a range of subtle and not so subtle behaviours that may involve individuals of the same or different gender.

Some examples of inappropriate behaviour are:

- Unwanted sexual advances or requests for sexual favours;
- Sexual jokes and innuendo;
- Verbal abuse of a sexual nature;
- Commentary about an individual's body, sexual prowess or sexual deficiencies;
- Leering;
- Whistling or touching;
- Insulting or obscene comments or gestures;
- Displays in the workplace of sexually suggestive objects or pictures; and
- Other physical, verbal or visual conduct of a sexual nature.

## OTHER HARASSMENT



Unlawful harassment based on protected characteristics other than sex/gender is also prohibited.

Harassment based on categories other than sex/gender is defined under this policy as verbal or physical conduct that denigrates or shows hostility or aversion towards a protected group or against an individual because of membership in such a group, when that conduct:

- Has the purpose or effect of creating an intimidating, hostile or offensive working environment; unreasonably interferes with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.
- Conduct that constitutes unlawful harassment on the basis of an individual's legally protected characteristics includes, but is not limited to:
  - Epithets, slurs or negative stereotyping;
  - Threatening, intimidating or hostile acts based on an individual's membership in a protected class;
  - Denigrating jokes, cartoons or pictures based on legally protected characteristics; or
  - Display or circulation in the workplace of written or graphic material (including email) that denigrates or shows hostility or aversion towards an individual or group based on a protected category.

## COMPLAINT PROCEDURE

### Informal Discussion

Persons who feel they have been subjected to harassment have the option of discussing the situation informally with the alleged offender. If for any reason persons do not wish to address the offender directly, or if such action does not successfully end the offensive conduct, they may contact GPT's Compliance Coordinator or their employee supervisor.

### Formal Process

Persons who believe they have been the victim of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with GPT's Compliance Coordinator.

GPT encourages the prompt reporting of complaints or concerns so that action can be taken.

Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.

Any reported allegations of harassment will be investigated thoroughly and promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Retaliation against employees for reporting in good faith harassment or for participating in an investigation of a charge is a serious violation of this policy and, like harassment itself, will be subject to disciplinary action up to and including termination. Acts of retaliation should be reported immediately to the Compliance Coordinator and will be promptly investigated and addressed.



Misconduct constituting harassment will be dealt with through responsive action, which may include:

- Training;
- Referral to counselling;
- Disciplinary actions such as warnings or reprimands;
- Demotions and/or withholding promotions;
- Reassignment;
- Suspension without pay; or
- Termination of employment.

Any questions or concerns about this policy should contact GPT's Compliance Coordinator.

