



# EQUAL OPPORTUNITY & ANTI-DISCRIMINATION POLICY

## INTRODUCTION

**Curverid Tobacco Limited (CTL)** is an Equal Opportunity Employer with a positive awareness of the Equal Opportunity and Anti-Discrimination laws. As mentioned in the **ZIM LABOUR ACT Labour Protection B.E. 2541 (1998) Amendment B.E. 2551(2008) of COUNTRY.**

Under international legislation, discrimination in employment is against the law **THE COMPANY** will not tolerate any form of discrimination or harassment. All employees have the right to enjoy an environment free of discrimination and harassment.

Discrimination undermines proper working relationships and may cause low morale, stress, absenteeism or resignations. All employees at all levels are responsible for adherence to this Policy.

## DEFINITIONS

### 1. Discrimination

Discrimination occurs when someone is treated unfavourably because of one of his or her personal characteristics including, but not confined to, the following areas:

- Gender
- Pregnancy
- Age
- Disability
- Physical characteristic
- Parental status
- Religion
- Sexual preference
- Social status
- Political belief and activity
- Trade union activity
- HIV/AIDS status
- Marital status
- Race
- Irrelevant criminal record

Discrimination may involve, but is not confined to, the following:

- Comments about other workers racial or ethnic background, sex, sexual preference, age, disability or physical appearance.
- Displaying pictures or posters which are offensive or derogatory, expressing negative stereotypes of particular groups.
- Judging someone on their beliefs, origins, appearance, sex rather than their work performance.
- Undermining a person's authority or work performance because you dislike one or some of their personal characteristics.

### 2. Harassment

- Harassment is any unwanted, unwelcome or uninvited behaviour, which makes a person feel humiliated, intimidated or offended, for example bullying or offensive verbal comments.
- Sexual Harassment is a legally recognised form of sex discrimination.
- Acts of sexual harassment can take many different forms, including but not confined to:
  - o Unwanted physical contact such as kissing, patting, touching, grabbing.
  - o Sexual propositions.
  - o Sexual intercourse under threat of loss of employment.
  - o Unwelcome remarks or insinuations about a person's sex or private life.
  - o Suggestive comments about a person's appearance or body.
  - o Sexually explicit conversations.
  - o Offensive telephone calls or Text messaging.
  - o Gender-based insults or taunting.
  - o Being followed home from work or repeated approaches after prior refusal.
  - o Offensive hand or body gestures.
  - o Offensive, humiliating or intimidating displays of sexually graphic material including posters, pictures or messages left on boards, desks, cupboards, computers or email.



- Behaviour that constitutes sexual harassment is illegal during any work-related function and will be subject to disciplinary action.
- Sexual harassment is not consensual sexual behaviour between two people who are attracted to each other. However, such behaviour is still inappropriate and not tolerated in the workplace.

## **PROCEDURES**

1. **CTL** does:
  - Do all that is reasonable to prevent discrimination from occurring at the workplace or work related environment;
  - Treat all employees on their merits without regard to race, age, sex, marital status, sexual preference, disability, religion or political conviction.
  - Investigate complaints of discrimination in the workplace professionally, confidentially and in a non-judgemental manner ensuring there is no presumption of guilt.
  - Raises the awareness of appropriate standards of conduct;
  - Not tolerate any victimisation or reprisals for making complaints;
  - Maintain confidentiality of all matters relating to a complaint
  - Not tolerate any misuse of this policy.
2. All employees have a responsibility to:
  - Report any form of discrimination observed within the workplace.
  - Maintain confidentiality of all matters relating to a complaint.

## **PENALTIES**

1. Disciplinary action will be taken against anyone who discriminates against another person in the workplace or work related environment.
2. Anyone who harasses or victimises a person who makes a complaint under this policy will face disciplinary action.
3. Any person who, without authorisation from the Manager, passes on confidential information regarding an investigation under this policy will face disciplinary action.
4. Disciplinary Action may involve a warning (verbal or written), transfer, or termination of employment.
5. Serious breaches of this policy may result in employment being suspended immediately until the investigation is completed.

**Mike Roberts**  
**MANAGING DIRECTOR**