



# Anti-Harassment and Discrimination Policy

Policy owner: Group Compliance

Our **Code of Conduct** clearly states that Lotus Bakeries aims to create a workplace where people are treated fairly and are provided with a healthy and safe working environment, enabling each and every individual to reach their full potential. It moreover stresses to treat people with dignity, honesty, fairness and respect and to abstain from any form of discrimination, harassment, verbal or physical abuse. To enable such healthy and safe working environment, Lotus Bakeries commits to the anti-harassment and anti-discrimination principles set out in this policy.

## I. OUR COMMITMENT

Lotus Bakeries is committed to providing a safe and respectful workplace environment. Employees, contractors, customers, or anyone who comes into contact with Lotus Bakeries is expected to maintain a professional and respectful demeanor at all times. Harassment or discrimination of any kind will not be tolerated.

Harassment and discrimination can come in many forms, including but not limited to:

- Verbal abuse or threats
- Physical assault or violence
- Sexual harassment or unwanted sexual advances
- Racial or ethnic slurs or jokes
- Age, gender, or disability-based discrimination
- And any other actions that are unwanted and/or which create an intimidating, offensive, or hostile work environment

With this Policy, Lotus Bakeries aims to increase its employees' awareness and understanding of workplace harassment, violence & discrimination and provide all of them - and more specifically the managers - with a framework to identify, prevent and manage allegations of harassment and discrimination at work.

## II. SCOPE

The anti-harassment and anti-discrimination policy of Lotus Bakeries applies to all of our operations and to all full-time, part-time, and temporary colleagues who are directly employed by Lotus, including our directors and officers, workers whose employment has been terminated, volunteers, job applicants, and any third parties whom come into contact with Lotus Bakeries such as business partners, customers, suppliers, service providers. The policy also extends to any subsidiaries or joint ventures where Lotus has a majority interest or management control.

Our commitment extends beyond our offices, plants, warehouses and buildings. Harassment and discrimination is prohibited both in the actual workplace and in any location that can reasonably be regarded as an extension of the workplace, including electronic communication.

### III. BACKGROUND AND GUIDING PRINCIPLES

Discrimination occurs when a person is treated less favorably than others because of characteristics that are not related to the person's competencies or the inherent requirements of the job or task. Discrimination can come in many forms, such as discrimination against indigenous peoples, migrants, minorities, people with disabilities, discrimination based on sex, race or religion, or discrimination based on sexual orientation and gender identity.

Discrimination can be expressed through harassment, though the harassers intent - whether motivated by discriminatory motives or otherwise - is irrelevant. The variety of conduct, practices or threats that may be covered under the general term "harassment" is very diverse. Examples of harassment are:

- Sexual harassment, e.g.: (i) sexual words, signs, jokes, (ii) inappropriate touching, (iii) sharing sexual photos, (iv) intimidation or physical violence of a sexual nature, (v) offering an advantage in return for sexual services etc.
- Physical harassment, e.g.: (i) physical assaults such as hitting, throwing, kicking etc., (ii) threatening behavior such as shouting and shaking fists in fury (iii) destroying property etc.
- Psychological harassment, e.g. (i) isolation, (ii) spreading rumors, (iii) verbal abuse, (iv) sabotage of a person's performance, (v) insults etc.
- Cyberbullying, which is sexual or psychological harassment that takes place over digital devices.

Discrimination and harassment can thus manifest in various ways and can be quite discreet, gradually eroding people's dignity and potential. It hinders individuals' ability to express themselves and engage in their employment fully. It also restricts opportunities and wastes valuable human talents.

Lotus Bakeries' employees and business partners are at the heart of our operations. We respect all of them and value their potential, regardless of race, ethnicity, gender, age, political beliefs, background etc. We want Lotus Bakeries to be a safe and respectful place to work for and work with. Harassment and discrimination are therefore simply unacceptable.

### IV. GOVERNANCE

Lotus Bakeries will regularly review and update this policy to ensure it is effective and well adapted to our dynamic company and global challenges.

Lotus Bakeries Executive Committee (Exco) is responsible for overseeing Lotus Bakeries anti-harassment and anti-discrimination policy and programs, thereby assisted by several departments, such a Compliance and HR. Regular reporting is done to the Board of Directors.

Lotus Bakeries moreover reports publicly on its compliance with and progress on anti-harassment and anti-discrimination topics annually, as part of its annual report.

## V. IMPLEMENTATION

It is the responsibility of the Human Resources department in each of the countries in which Lotus Bakeries operates to ensure that this Policy is rolled out in each legal entity and fully enforced.

This policy sets out the minimum standards for addressing and preventing discrimination and harassment. However every Lotus entity may implement additional policies addressing these issues. In different countries additional procedures are rolled out involving trained internal and external trusted advisors.

## VI. REPORTING MISCONDUCT

Despite our commitments on ethical behaviour, conduct that seems to violate this policy or applicable laws and regulations can and should always be reported.

By speaking up, you give Lotus Bakeries the opportunity to review and act on the issue. We believe that speaking up is key to sustaining our reputation, success and license to operate. We greatly value the help of employees and others who identify and speak up about potential concerns that need to be addressed. People who speak up are protected and will not suffer for raising concerns in good faith about suspected misconduct. Lotus Bakeries will not tolerate any form of retaliation against you for speaking up.

You may use a variety of reporting channels set out in our [Whistleblowing Policy](#), amongst which our web-based reporting system (organized via the independent party convercent by OneTrust) to raise concerns confidentially or anonymously and in your own language.

[Lotus Bakeries Whistleblowing line](#)

For more information or questions, please contact Group Compliance (via e-mail [group.compliance@lotusbakeries.com](mailto:group.compliance@lotusbakeries.com)).