

# EVEREADY EAST AFRICA LIMITED

## NOTICE OF ANTI-HARASSMENT AND NON-RETALIATION POLICY

Eveready East Africa Ltd. seeks to maintain high standards of business by creating and maintaining a work environment that is free from unlawful harassment. It is Eveready East Africa Ltd. policy that harassment on the basis of any legally protected category is prohibited. Therefore, any harassment based on race, sex, creed, color, religion, national origin, ancestry, age, gender, sexual orientation, veteran status, or a physical or mental disability is a violation of Company policy. Any form of retaliation or reprisal against persons who initiate complaints under this policy, or who assist in a complaint investigation, is expressly prohibited by this policy. We take these policies very seriously and violations of these policies may result in disciplinary action up to and including immediate discharge without prior warning.

All colleagues are prohibited from engaging in harassment that violates this policy and are expected to respect the rights of their fellow colleagues to work in an environment free from harassment. Managers and supervisors are responsible for enforcing this policy and for maintaining a workforce free from unlawful harassment. Any supervisor or manager who becomes aware of harassment or inappropriate behavior should consult immediately with their Human Resources Department or Managing Director to ensure that a prompt investigation takes place and that the proper corrective action is taken when warranted.

Harassment is conduct relating to an individual's race, sex, religion, color, age, gender, sexual orientation, national origin, ancestry, veteran status or status as an individual with a disability that has the purpose or effect of:

- ✓ Creating an intimidating, hostile, or offensive work environment by such conduct,
- ✓ Unreasonably interfering with an individual's work performance by such conduct,
- ✓ Otherwise results in a tangible effect on a colleague's employment terms.

Included in this prohibition is any conduct, whether it be verbal, written or by electronic communication, that adversely affects an individual's employment, work status, evaluation, wages, a change in benefits, advancement, demotion, assignment or reassignment of duties or shift or any other condition of employment or career development. Similarly, no colleague shall promise, imply or grant any preferential treatment in connection with another colleague's or applicant's engagement in, or refusal to engage in prohibited conduct.

Please review carefully the following nonexclusive list of examples of inappropriate conduct/harassment that may violate both Company policy and the law:

- ✓ Verbal Harassment  
such as epithets, derogatory comments, demeaning jokes, slurs, threats, graphic verbal commentaries about any person's body; degrading words used

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to describe an individual; unwelcome flirtations, advances or propositions or other verbal abuse.

- ✓ Physical Harassment  
such as physical assault, unnecessary touching, impeding or blocking movement, physical interference with normal work movement, etc.
- ✓ Visual Harassment  
such as derogatory or demeaning posters, cards, cartoons, graffiti, gestures, stories, jokes, slurs, graphics, or other displays in the workplace of suggestive or explicit objects or pictures. This prohibition extends to any kind of communication that is or may be seen by another, whether or not sent directly to them, and includes e-mail communications and inappropriate access to Internet sites.

**REQUIRED ACTION WHEN YOU HAVE A COMPLAINT:** Any colleague who has a question or concern regarding any type of discrimination or harassment, or who feels that they are the victim of unlawful harassment, including but not limited to any of the conduct listed above, by any supervisor, manager, co-worker or customer, client, or any other person in connection with employment at Eveready East Africa Ltd. must immediately bring the matter to the attention of any of the following so that the conduct may be addressed to prevent further occurrences: their Supervisor, their Department Manager, Human Resources Representative or Managing Director. In the event the colleague's Supervisor or Department Manager is the source of the unlawful harassment, the colleague must immediately bring the matter to the attention of the Managing Director or email [alert@eveready.co.ke](mailto:alert@eveready.co.ke) or call 020-310-185 to leave a message for the Eveready Audit Committee.

All bona fide concerns will be reviewed and an impartial investigation will take place in a timely manner. Every effort will be made to conduct the investigation in as discreet and confidential a manner as possible, with disclosure made only where there is a need to know. When warranted, appropriate corrective action will be taken. Some examples of possible appropriate corrective action include: counseling, training, transfer, suspension with counseling, and/or termination of employment.

**RETALIATION PROHIBITED:** Any form of retaliation or reprisal against persons who initiate complaints under this policy or who assist in a complaint investigation is expressly prohibited by this policy. Any individual violating this anti-retaliation provision will be subject to appropriate disciplinary action, up to and including termination.

Steven George Smith  
Managing Director