



DISTRIBUTORS LIMITED

SEXUAL HARASSMENT POLICY

LASCO Distributors Limited is committed to providing a safe environment for all its employees, contractors and business partners free from discrimination on any ground, embracing diversity and void of harassment, including sexual harassment. **LASCO Distributors Limited** will adopt a zero tolerance approach to 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 in the line with the Progressive Disciplinary Schedule up to and including suspension and/or termination.

OBJECTIVE

To define what sexual harassment is, the various scenarios and to outline the procedures to report and handle the complaints, so as to protect employees from unwanted sexual advances.

Additional Authority:

Sexual Harassment Bill

Scope:

This policy is intended to give a framework to adequately cover the issue of sexual harassment in the workplace in a current context and reality that it is an issue that affects workers' safety, poses risk to the company in its brand representation and possible litigation. The policy covers all the channels and correct procedures to resolve cases.

EXCERPT FROM PROGRESSIVE DISCIPLINARY GUIDELINES

VIOLATIONS	DISCIPLINARY PROGRESSION			
	First Offence All first offence must be verbally warned, in addition to the other specified sanction/s	Second Offence	Third Offence	Fourth Offence
26. Sexual harassment (See sexual harassment policy)	Written warning (Counseling)	Suspension/Dismissal	Dismissal	
27. Engaging in a sexual act on the company's premises. (See sexual harassment policy)	Suspension/Dismissal	Dismissal		

All complaints of sexual harassment will be taken seriously and treated with respect and utmost confidentiality. No one will be victimised for making such a complaint and each case will be thoroughly investigated and weighted on its own merit. Complaints which are found to be untrue and mischievous will be seriously treated and the party causing the mischief will be sanctioned.

Definition of Sexual Harassment

Sexual harassment is any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated.

It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment or "sexual advance" can involve one or more incidents and actions constituting harassment, which may be physical, verbal and non-verbal.

Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- The use of job related threats or rewards to solicit sexual favours

- Unwarranted comments on another's appearance, age, private life, etc. which are intended to cause discomfiture
- Sexual comments, or telling of stories and jokes which are sex related
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the gender of the worker to undermine an individual without cause
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)
- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

*The above list is not exhaustive, and it is understood that it is the receiving party who determines what is considered 'unwanted and unwelcome' and therefore harassment. *

Anyone can be a complainant of sexual harassment, regardless of their gender and of the gender of the harasser.

LASCO Distributors Limited recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Sexual harassment is in some cases a manifestation of power relationships and abuse of power and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

All sexual harassment is prohibited whether it takes place within the premises or outside, including at social events, business trips, training sessions or conferences sponsored by **LASCO Distributors Limited**. Anyone, including employees of **LASCO Distributors Limited**, contractors, business partners, customers, casual workers, or visitors who sexually harasses another will be reprimanded in accordance with this internal policy. Whereas it may not be within the ambit of the company to sanction external parties, we will reserve the right to discontinue business with that entity or person until the proper redress is taken. This is in line with our policy and more so our overarching values on respect for others, integrity and creating a safe work environment for all.

Reporting a Complaint

Although complaints of sexual harassment can be dealt with by adopting the grievance procedure steps, **LASCO Distributors Limited** prefers to exact specific procedures to deal with sexual harassment to respond better to the needs of complainants and to ensure that investigations are carried out properly. Individuals who deal with sexual harassment complaints are trained specifically on this issue and on the nature of sexual harassment. As such, complaints will be dealt with exclusively by the Human Resource Department.

Further, complainants of sexual harassment may want to resolve the matter in different ways. Some may be happy with an informal resolution and for the matter to stop, others may want more formal measures.

In addition, informal resolution mechanisms may be inappropriate where the allegation is serious or where the harasser is also the complainant's supervisor.

It is therefore very important then that the Human Resource professional handling the complaint be aware and sensitive to these different needs and ways of resolving conflict, as well as the sensitivity of resuming normality when there is a Manager/Supervisor and employee dynamic.

Steps in Handling Sexual Harassment

1. Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. If for whatever reason, the harassed party feels threatened or fearful to speak to the offending party, then it is to be reported to the Human Resource Department

When the report is received the Human Resource Officer will:

- Interview the complainant to understand the complaint
- Have the complainant write a report
- Immediately record the dates, times and facts of the incident(s)
- Ascertain the views of the complainant as to what outcome he/she wants
- Ensure that the complainant understands the company's procedures for dealing with the complaint
- 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 complainant from pursuing a formal complaint if he/she is not satisfied with the outcome
- Keep a confidential record of all discussions
- Respect the choice of the complainant
- Ensure that the complainant knows that they can lodge the complaint outside of the company through the relevant authorities, especially if a perceived threat exists outside of work.

If the harasser is also the designated person/HR Officer or the complainant is concerned about bias on the part of the designated person/HR Officer, then the matter will require escalation to the General Manager and/or the Managing Director. If the designated person/HR Officer is away on leave, then the same applies.

If the complainant would rather report it to a woman than a man or to a man than a woman then he or she will either speak with the HR Officer, the General Manager and/or the Managing Director as it applies.

If the complaint is regarding the General Manager, the Managing Director or a Board Director, then the report is made to the Board Secretary who will submit to the Corporate Governance Committee.

LASCO Distributors Limited understands that sexual harassment can be very disturbing emotionally and mentally and as such will offer the complainant help from a counsellor, if deemed necessary, usually a business partner of the company. Where the distress is caused by the struggle to report a Supervisor and/or Manager, The HR Officer will offer counselling and guidance on the protection the company affords against victimization.

2. To continue with the report on the alleged harassment, the designated person/HR Officer will:
 - Give an opportunity to the alleged harasser to respond to the complaint
 - Ensure that the alleged harasser understands the complaints mechanism

An independent investigation to include interviewing witnesses, if there are any, will be launched. This is critical in protecting the interest and reputation of the accused, and to ensure the complainant is not being mischievous and malicious in their actions.

3. A discussion will be facilitated between both parties, if the complainant permits and is not fearful, to achieve an informal resolution which is acceptable to the complainant.
4. Ensure that a confidential record is kept of what ensues in those meetings.
5. Follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped
6. Ensure that the above process is done speedily and within 7 days of the complaint being made

If the above steps did not lead to a satisfactory outcome for the complainant, and the behaviour persists the matter will be referred to an external investigator, recommended by the Company, who will be granted access to the parties involved. The external investigator would then prepare a report of their findings to be presented to the board of directors for further consideration and action.

The person carrying out the external investigation will:

- Interview the complainant and the alleged harasser separately

- Interview other relevant third parties separately
- Produce a report detailing the investigations, findings and any recommendations

The Board will then deliberate with the external investigation and decide on the appropriate steps considering all the facts.

The Board may explore inter alia:

- an apology
- a change to working arrangements
- a promotion if the complainant was demoted as a result of the harassment
- training for the harasser,
- discipline, suspension, dismissal
- a formal report to the Police

The Board members, just as HR personnel or investigators dealing with sexual harassment, will be trained on understanding and deciding what constitutes sexual harassment, how to investigate it, etc. It is also vital that the wishes and needs of the complainant are incorporated into the outcome of the complaints mechanism. For example, if it is found that a complainant was harassed by a colleague and that they work together on a daily basis, the views of the complainant should be ascertained before making a decision on re-organizing the office. For example, the complainant may not want to be moved to a different department and as the complainant, he/she should be entitled to decide this and not be re-victimised by being forced to move within the company.

Outside Complaints Mechanisms

A person who has been subject to sexual harassment has the right to make a complaint outside of the company. They can do so through the Jamaica Constabulary Force and/or legal counsel.

Sanctions and Disciplinary Measures

Each case will be weighted on its own merit and set of circumstances, but all deemed very serious by the Company. 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
- Transfer
- Demotion

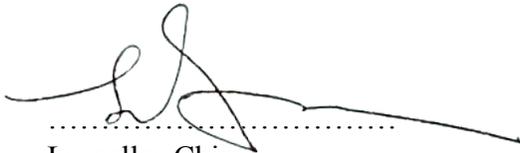
- Suspension
- Dismissal

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 and report to the Police.

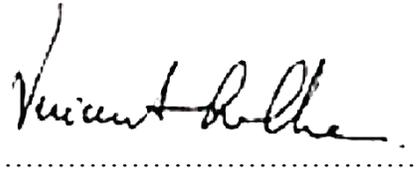
NEED FOR AWARENESS OF THE POLICY AND ITS TIMELY REVIEW

There is an obligation on the company to ensure that all employees are aware of the policy and abide by it. The policy will be evaluated periodically to ensure it upholds the values of the company and attains the objective of keeping the workplace safe, protecting complainants of sexual harassment and regulating the workplace to maintain order.

Monitoring and evaluation can be done through different means, including questionnaires completed by employees, feedback from complainants or those who work in the complaints procedure. Quarterly updates should be provided to the board regarding complaints received about sexual harassment. This is important to review the effectiveness of the policy and the complaints procedure.



Lascelles Chin
Executive Chairman



Vincent Chen
Company Secretary

DOCUMENT CONTROL

<i>Version</i>	<i>Date reviewed</i>	<i>Date Approved by Board</i>	<i>Area Changes made</i>
1 st	March 2021	May 26, 2021	