

alteo

Equal Opportunity Policy



1. PURPOSE

Alteo Group is an equal opportunity employer and through this policy we aim to strengthen our position as an organisation where employees will make full use of their talent, skills, experience and competence, and feel safe, respected and valued regardless of their age, caste, colour, creed, ethnic origin, impairment, marital status, place of origin, political opinion, race, sex or sexual orientation, and criminal record, (hereinafter referred to collectively as “Status”).

Alteo in compliance with the National Code of Corporate Governance and Equal Opportunities Act 2008, (hereinafter the “Act”), is geared towards the respect of equality, diversity and inclusion in its workforce and eliminate any unlawful discrimination. The aims of this policy are to ensure that:

- No one receive less favourable treatment by reason of his/her Status.
- Opportunities for employment, training and promotion are open to all candidates irrespective of their Status.
- Selection for employment, promotion, transfer and training, and access to benefits, facilities and services, will be fair and equitable based solely on merit and not on ones Status.

Furthermore, Alteo is committed to building awareness amongst its employees of what constitutes discrimination and the eventual consequences of a potential violation. This policy also explains how to address an incident of discrimination so that our employees know that Alteo stands firm on fairness and complaints will be taken seriously, without fear of reprisal for the employee.

2. FORMS OF DISCRIMINATION

As per the Act, discrimination comes under three (3) different forms.

2.1. DIRECT DISCRIMINATION

A direct discrimination occurs when a person is treated/or proposed to be treated less favourably because of his/her Status.

It is hereby also noted that discrimination on grounds of sex is not limited to the gender of an individual and encompasses further application under the Act, including discriminating on the grounds of potential pregnancy, pregnancy, family responsibility to care/support for a dependent child/family member.

2.2. INDIRECT DISCRIMINATION

An indirect discrimination takes place when a practice is imposed/proposed to provide a condition which shall disadvantage a person regarding his/her Status, is not justifiable in the circumstances and have the effect of disadvantaging the aggrieved person when compared to other persons of the same status.

This may be less obvious to identify but will have the effect of disadvantaging a person. For instance, an advertisement for recruitment of a role which imposes a condition that does not commensurate with the nature of the job, skill or characteristics.

2.3. DISCRIMINATION BY VICTIMISATION

Discrimination by victimisation occurs where an employee is treated less favourably for having made a complaint in good faith, has brought or proposes to bring proceedings against a discriminator or other person, to provide information in a discrimination investigation and/or has attended an inquiry under the Act to provide evidence or testimony as a witness.

3. EXCEPTIONS TO UNLAWFUL DISCRIMINATION

There are certain exceptions that are provided under the Act whereby a discriminatory action shall not be unlawful where it is applied in line with the Act in the following circumstances:

- (i) Sex Discrimination – Genuine Occupation/Activity requirement, i.e where the duties relating to the employment/activity:
 - Can only be performed by a person having a particular physical characteristic, other than strength and stamina, that are possessed only by persons of that sex;
 - Need to be performed by a person of a particular sex to preserve decency or privacy; and
 - Is related to sports.
- (ii) Discrimination due to impairment:
 - An employer would not be discriminated against for not considering a candidate in a particular field if the candidate had such impairment that would make him/her genuinely not be able to perform the duties required; and/or
 - Would impose an unjustifiable hardship on the Employer; and/or
 - Would under all circumstances be a Health & Safety risk.
- (iii) In relation to a criminal record:
 - Unless the Employer can prove that the relevance of the criminal record to the nature of the employment may be affected. The burden of proof shall rest on the Employer or prospective Employer.
- (iv) Further Exceptions:
 - Grounds of age – where the offer of employment is limited to persons of a particular age or restricted under local laws; and
 - Protection of Health & Safety (Hygiene).

4. SEXUAL HARASSMENT

Sexual Harassment occurs when an employee is subjected to unsolicited sexual acts including, physical, verbal, gestures, promise of reward in exchange of sexual favours, written etc. As per the Act and the International Labour Office¹, sexual harassment is any unwelcome and offensive gesture of a sexual nature from a perpetrator whether for self interest, in exchange of a reward etc.

Alteo is committed to ensure that it provides a safe and serene place of work. In line with its values, Alteo fosters a culture of respect and integrity and shall therefore uphold its responsibility and legal obligation to ensure that sexual harassment is never tolerated. Sexual harassment undermines equality at work by calling into question the integrity, dignity and well-being of employees. Behaviour that qualifies as sexual harassment includes but are not limited to:

- Physical _ Physical violence, touching, unnecessary close proximity
- Verbal _ Comments and questions about appearance, lifestyle, sexual orientation, offensive phone calls, jokes etc.
- Non- Verbal _ Whistling, sexually suggestive gestures, display of sexual materials.

Employees are encouraged to report anyone who may be condoning/perpetrating such conducts to ensure that such behaviours never infiltrate Alteo.

5. RECRUITMENT AND PERSONS IN EMPLOYMENT

5.1. RECRUITMENT, PROMOTION & TRANSFERS

All opportunities for employment, promotion and transfer shall be advertised, internally and externally. All applicants will be considered irrespective of their Status. Selection criteria will be entirely related to the best suited candidates with the best skill set for the job. When it comes to selecting, recruiting, employing, appraising or promoting an employee, the employer must ensure that its decision is based on the merit of the person and not his or her status.

5.2. PERSONS IN CURRENT EMPLOYMENT

Alteo shall provide for opportunities for training, development, and progress for its employees, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency for Alteo. The Human Resources Department shall be responsible to oversee the overall strategy for training and development of Alteo employees.

¹ https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/briefingnote/wcms_738115.pdf

5.3. PERSONS WITH A CRIMINAL RECORD

Where a person has a criminal record which is irrelevant to the nature of the employment/promotion for which the latter is being considered, he/she shall not be subject to discrimination.

The burden of establishing the relevance of the criminal record to the nature of the employment shall rest with the employer when carrying out a recruitment or evaluating a person for a promotion.

6. TRAINING

It is not uncommon for individuals to unintentionally discriminate against others, often through unconscious bias, but by creating awareness of what constitutes unfair treatment, can be an effective way of curbing this type of behaviour.

Training to all Alteo employees shall raise awareness about discrimination, harassment, and victimisation in the workplace, and to explain of the consequences of unacceptable conduct at work.

Furthermore, specialised training shall be provided to Head of Departments, Managers and employees in key decision-making areas positions on the discriminatory effects that certain provisions, practices, requirements, conditions and criteria can have on employees.

7. COMPLAINTS

Complaints on discrimination are taken very seriously and shall be investigated by Alteo. Appropriate actions, including disciplinary actions, will be taken where applicable.

Any person who feels that they have been the subject of or a witness to, an act of discrimination or sexual harassment at Alteo, is encouraged to immediately report the incident to either a Head of Department, Human Resources Department via the *Grievance Procedure* or via Alteo's whistleblowing channels, as provided under Alteo's *Whistleblowing Policy*. All complaints will be treated in strict confidentiality.

The Act also provides the possibility to any aggrieved person to report a matter to the Equal Opportunities Commission (the "EOC"). The EOC is an independent statutory body set up under the Act to promote anti-discrimination and equal opportunity principles and policies throughout Mauritius. Complaints can be filed online and within twelve (12) months of the alleged act of discrimination.

8. ADMINISTRATIVE PROVISIONS

8.1. POLICY SUMMARY

Document Name	Equal Opportunity Policy
Policy Owner	Legal and Corporate Affairs Dept.
Effective Date	24/06/2022
Approval Level	3

Approval Authority	Board of Alteo Limited
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8.2. DISTRIBUTION LIST

Policy		Tick as Appropriate
Agri & Indus COOs & Property CEO		✓
Executives		✓
Head of Departments		✓
Employees	Staff	✓
	Workers	✓
	Casuals	✓
Unions		✓
Job Contractors		✓
Service Providers		n/a
Clients		n/a
Other Stakeholders		n/a

8.3. RELATED POLICIES

Policy Name	Policy Owner
Grievance Procedure	HR
Whistleblowing Policy	LCAD

END OF POLICY DOCUMENT