

Equal Opportunity Policy

Principle:

The Great Eagle Group of Companies (“the Group”) is an equal opportunity employer and is committed to promoting equal opportunity (“EO”) among employees.

The aim of this policy is to ensure that no job applicant or employee receives less favourable treatment or is disadvantaged by sex, race, pregnancy, disability, marital status or family status during employment or when applying a job with the Group.

Objectives:

1. Discrimination

The Group will not tolerate direct or indirect discrimination against employees or job applicants on the basis of sex, race, pregnancy, disability, marital status or family status.

2. Harassment

The Group will not tolerate sexual harassment or disability harassment. Harassment is behaviour that is not welcome, not asked for and not returned, and which is likely to cause an uncomfortable workplace by humiliating, seriously embarrassing, offending or intimidating someone. All employees are responsible for their own actions and should not engage in potentially offensive behaviour. It is not necessary for the person being harassed to have to tell you that they were humiliated or offended by the behaviour.

3. Vilification

Vilification of an employee because of their disability is unacceptable in the Group. Vilification is any activity in public that incites hatred,

serious ridicule or contempt of a person because of their disability. Where such behaviour includes threats of harm or property damage, it may constitute serious vilification, which is a criminal offence.

4. Victimization

The Group will not disadvantage you for complaining about unlawful conduct in this workplace or for helping someone else to do so. We take reports of discrimination, harassment, vilification and victimization very seriously and will handle such complaints as quickly, confidentially and fairly as possible.

Application:

This policy shall cover management, supervisors, all employees of the Group including those on commission, casual workers and contractors. This policy applies to all human resources aspects of the Group operations, including:

- advertising for job vacancies
- recruitment
- training and development opportunities
- promotion
- work allocation
- shifts, rosters, hours of work and overtime
- salary levels and packages
- terms and conditions of employment
- leave arrangements
- pregnancy arrangements and associated leave
- performance assessment
- disciplinary procedures
- restructuring
- dismissal, redundancy and termination of employment

This policy will also apply to provision of goods, services and facilities as well as management of premises.

Duties of Employees:

While the Group will endeavour to provide a working environment that is free of discrimination, harassment, vilification, and victimization, the Group will also count on the duty and responsibility of all employees to implement this policy to the fullest extent.

Procedure for handling EO related complaints:

1. The complainant can try to resolve issues himself/herself and to do so as soon as possible after the incident.
2. If the complainant would like to talk over an issue or find out what his/her rights are, he/she may contact the Group's EO representative who is the Human Resources Department Head. EO representative will meet with him/her as soon as possible. In general, EO representative will not discuss his/her problem with anyone else without his/her permission. The only exception to this is if he/she tells EO representative something that may affect someone's safety.

Depending on what he/she decides and after taking details from him/her, EO representative will approach the other person(s) involved in the issue as soon as possible (and preferably within two workdays after meeting with the complainant) and obtain their side of the story.

Within five workdays after speaking to the other person(s), and ten workdays from the date the complainant first approached EO representative, EO representative will speak to witnesses if further information is needed. Witnesses may include people who did not actually see what happened, but who observed the complainant's reaction or other related behaviour.

EO representative will then decide if there is enough information to know whether his/her allegation happened (using the standard of proof that it is more likely than not to have happened). EO representative will also determine whether disciplinary action is required.

Where allegations are proved, EO representative (or his/her manager) will resolve the problem by:

- bringing everyone together for a meeting to reach an agreement or resolve issues if the allegation is not of a serious nature;
- taking appropriate disciplinary action (such as requiring an apology, counselling, an official warning, transfer, demotion, loss of promotion rights for a set period) against the person(s) responsible if the allegation is serious.

Training on EO issues may also be arranged for all staff to ensure that everyone knows what is and is not acceptable workplace behaviour.

3. If complainant is still unsatisfied with the decision reached under this procedure, or he/she does not feel comfortable bringing it to the Group's attention, he/she can contact the Equal Opportunities Commission for information and advice.

The Group will handle the EO related complaints:

Confidentially

Only those directly involved in the issue or complaint (including anyone helping to sort it out) will have access to information about it. Information about the problem will only go on an employee's file if they are disciplined in relation to it.

Impartially

Everyone involved in the issue will get the chance to tell their side of the story, and will be treated as fairly as possible. The person handling the issue or complaint will not make a decision or take any action until all relevant information has been gathered.

Speedily

The Group will handle all issues or complaints as quickly as possible. Where possible, the Group will try to resolve all issues within one month.

The Group will not tolerate:

Victimization

Less favourable treatment or disadvantage of anyone involved in an issue or complaint being handled under this procedure will be disciplined. Malicious use of this procedure (for example, to lie about someone) will also be disciplined.

The Group will not take any action without proof. The Group will investigate all issues before making a decision and/or taking action. The Group will only take action if it is more likely than not that the allegations happened.