

Anti-harassment & Anti-discrimination Policy





Anti-harassment & Anti-discrimination Policy

At Delta Corporation, our dream is to bring people together for a better world. In fulfilling our dream, each of us is responsible for promoting a culture that results in a safe, positive, diverse and inclusive work environment where people can flourish.

OBJECTIVE & SCOPE

Objective:

The purpose of this Anti-Harassment and Anti-Discrimination Policy ("Policy") is to ensure our colleagues can thrive in an inclusive workplace free from all forms of harassment, including unfair discrimination, sexual harassment and sexual misconduct. This Policy protects our colleagues against inappropriate actions that are unwanted and unwelcome and/or which create an intimidating, offensive, or hostile work environment.

Delta Corporation takes harassment and discrimination very seriously and all complaints of harassment will be promptly investigated. Delta Corporation will take appropriate disciplinary action in cases of harassment as per provisions of our Employee Code of Conduct.

Delta believes that sexual harassment and discrimination are not behaviours that can be tolerated or that can exist unaddressed within the organization.





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All Delta colleagues are owners of this Policy. Colleagues who manage or supervise one or more colleagues have additional responsibilities to report violations and to enforce this Policy, and will be assumed to be familiar with the contents of this Policy, regardless of whether they have undergone formal training on its contents or not.

Violations of this or any other Delta Policy can be reported through one of the available reporting channels. If you have any questions about your obligations under this Policy, you should contact your HR Executive or HR Business Partner, the Legal Team, or your local Management Team.

Scope:

This Policy extends to all Delta colleagues (permanent, contracts and casuals), including colleagues of any subsidiaries or joint ventures where Delta has a majority interest or management control.

This Policy also covers third parties when dealing with Delta colleagues (e.g., contractors, vendors, suppliers, retailers, customers, and guests) and Delta colleagues can rely on this Policy in case of harassment by third parties who deal with Delta.





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We do not tolerate harassment of colleagues by non-colleagues, nor do we tolerate harassment of non-colleagues by colleagues in our Company Workplace.

If you experience or witness harassment by a third party, you should report it through the same channels as you would report any harassment complaint. Delta will take appropriate action to investigate and remediate the issue.





DEFINITIONS

1. Company Workplace

Our commitment to a harassment-free workplace extends beyond Delta's offices and buildings.

Harassment is prohibited both in the actual workplace and in any location that can reasonably be regarded as an extension of the workplace, including washrooms, Delta worksites, accommodations provided by Delta, work-related social events, office parties, client entertainment events, any mode of transportation provided by Delta (or a representative of Delta) for undertaking a journey to and from the aforementioned locations, and any other location where Delta business is being conducted or which can be reasonably regarded as an extension of the workplace (all of which we consider to be our "Company Workplace" under this Policy).

Harassment can also take place online or through electronic communications. While messaging and posting information online can be a great way to connect with others, always conduct yourself in a manner that is consistent with this Policy and Delta Social Media Policy.





2. Harassment

Includes all inappropriate conduct that creates a disrespectful, intimidating, hostile, degrading, humiliating, or offensive environment. Harassment may involve verbal or physical conduct including comments, actions or gestures that affect a colleague's dignity or psychological or physical integrity. Harassment can range from extreme forms such as violence, threats, or physical touching to less obvious actions like ridiculing, teasing, or repeatedly bothering colleagues or subordinates or refusing to talk to them. A single incident that has a lasting harmful effect on a colleague or a series of incidents may be harassment.

Examples of behaviour that may be harassment include:

- Threats or demands that a person submit to sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment-related benefits in return for sexual favours;
- Racial slurs, derogatory remarks about a person's accent, display of racially offensive symbols;
- Unwelcome sexual advances or requests for dates;
- Displaying or sharing offensive images such as posters, videos, photos, cartoons, screensavers, emails, or drawings that are derogatory or sexual;
- Unnecessary or unwanted physical contact such





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as kissing, groping or massaging, blocking normal movement, or physically interfering with the work of another individual;

- Physical assault or stalking;
- Intimidating acts, such as bullying or threatening;
- Offensive comments about appearance, or other personal or physical characteristics, such as sexually charged comments or comments on someone's physical disability;
- Derogatory or insensitive jokes, pranks, or comments;
- Comments about a person's private life or the way they look;
- Non-verbal behaviour such as staring, leering, whistling or indecent gestures;
- Ridiculing or demeaning comments;
- Innuendos or veiled threats;
- Unreasonably or unjustifiably excluding someone from normal workplace conversations and making them feel unwelcome;
- Sabotaging a person's work;
- Comments that ridicule or stereotype people;
- Unwillingness to train, evaluate, assist, or work with a colleague; or
- Any other conduct that shows hostility toward, disrespect for or mistreatment of an individual.
- This list of examples is not exhaustive, and there may be other behaviours that constitute Harassment under this Policy.





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Victims of harassment can be of the same or different sex, race or other status as the harasser. “I was joking,” “I didn’t mean it that way,” “this is acceptable where I come from,” or “no one has ever complained about this behaviour before”, are not excuses for harassment, nor is being under the influence of alcohol or other substances.

It is a violation of this Policy to engage in harassment of any kind.

3. Sexual harassment

Includes any unwelcome sexual advances, unsolicited sexual attention, demand or request for sexual access or favours, sexual innuendos or other unwelcome verbal or physical conducts of a sexual nature.

Conduct can be sexual harassment even when it is not motivated by sexual desire.

Conduct can be sexual harassment regardless of the victim’s gender or gender expression.

Conduct can be sexual harassment regardless of the harasser or victim’s position at Delta.





It is a violation of this Policy to engage in sexual harassment of any kind.

4. Discrimination

It is the unfair denial of equal treatment and opportunity to individuals or groups based on one or more of the characteristics listed below, with respect to the terms, conditions, or privileges of employment, including but not limited to, hiring, firing, promoting, disciplining, scheduling, training, or deciding how to compensate that colleague:

- Race, colour, ethnic or national origin;
- Age;
- Religion or religious beliefs;
- Pregnancy, childbirth, or breastfeeding;
- Sexual orientation;
- Gender and gender expression;
- Nationality, immigration status, citizenship, or ancestry;
- Physical or mental disability, medical condition, genetic information or characteristics (or those of a family member);
- Parental status;
- Status as a victim of domestic violence, sexual assault or stalking; or
- Any other basis prohibited under applicable local laws.





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This list is not exhaustive and there may be other circumstances in which colleagues are unfairly denied equal treatment.

It is a violation of this Policy to engage in discrimination of any kind.





REPORTING

1. Reporting Harassment

If you have been subjected to any form of harassment, or if you have witnessed others being subjected to harassment, you can report the incident(s) through Delta's HR Teams, Line Managers, Delta Helpline email noharrassment@delta.co.zw or report through TIP Off Anonymous.

Our Tip Off Anonymous platform is available 24 hours and is monitored daily. It is available to all colleagues, where you can CONFIDENTIALLY and, if you choose, ANONYMOUSLY report any concern in relation to potential breaches of this Policy or of other Company Policies. It is a secure means of reporting, provided by an independent company.

Alternatively, you can also report harassment through any of the following channels:

- Your Worker Leaders
- Your Health & Wellness Member
- Peer Educators
- Legal Team
- Company Psychologists





2. Reporting Sexual Harassment Complaints

To make it easier for colleagues to understand their rights and obligations under the Policy, Delta has designated all HR Business Partners and Health and Wellness Personnel as Ambassadors. GMs can also identify other people who can act as Ambassadors.

The role of the Ambassador is to ensure that sexual harassment complaints are identified in a timely manner and directed through the proper channels.

The GM/Director of each Business Unit will appoint two individuals per site or geographical area (depending on size). In selecting the Ambassadors, the GM/Director should consider the seniority (each Ambassador should be at minimum a Band D) and diversity (consideration should be given as to whether the Ambassadors should be different genders and from different functions (e.g. HR and Line).

The GM/Director shall also ensure that the Ambassadors receive special training with respect to identifying behaviour indicative of sexual harassment, interacting with potential victims of sexual harassment, confidentiality, sensitivity and handling the initial phases of sexual harassment complaints. Ambassadors have a duty to ensure that complaints of sexual





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harassment are appropriately and reported in a timely manner through the defined structures as per Code of Conduct.

The Company also, will look to Ambassadors for guidance and suggestions on how to improve the implementation of this Policy, the procedures mandated by this Policy and any associated trainings. To be clear, Ambassadors are not responsible for investigating complaints or disciplinary action – rather, they are there to help raise awareness of the Policy and safeguarding the sanctity and integrity of the processes and procedures.

The Management Committee of each Business Unit will also be responsible for ensuring that the names of Ambassadors are prominently displayed on the relevant communication channels (including service desk, noticeboards etc.) and that all colleagues are notified and then periodically updated by email with the names and contact information of their Ambassadors. If an Ambassador leaves the Company, transfers or is no longer able to serve as Ambassador, the Management Committee of the Business Unit will be responsible for appointing a replacement Ambassador as soon as practically possible.





3. Reporting requirements of Managers & Supervisors

Line Managers or HR Business Partners who receive harassment complaints, must within 5 business days, report the complaint through the relevant structures as per the Code of Conduct.

Line Managers and HR Business Partners who become aware or have knowledge of a serious and/or systemic violation of this Policy must report as soon as reasonably practicable.

If Line Managers do not timely report potential violations of this Policy, they will be subject to disciplinary action.

Nothing in this Policy should be read to condone or encourage independent investigation of complaints under this Policy by Managers and Supervisors. Rather, concerns under this Policy should be reported to the HR, Legal or Tip Off Anonymous Team.





INVESTIGATIONS PROCESS

Delta will investigate any complaint under this Policy promptly, thoroughly and impartially, in accordance with the Code of Conduct. All colleagues are expected to co-operate with investigations undertaken pursuant to this Policy. Failure to co-operate in an investigation may result in disciplinary action, up to and including termination of employment.





NO RETALIATION

We recognize that colleagues may find it difficult to raise complaints about harassment, so this Policy is meant to encourage colleagues to come forward with their concerns without fear of retaliation.

Examples of retaliation include termination, demotion, refusal to promote, transfer (in some circumstances), or any other adverse action that would discourage a reasonable person from opposing perceived harassment or discrimination. Retaliation also includes adverse action taken against family members or other people associated with the individual raising complaints of harassment.

Accordingly, it is a violation of this Policy for any colleague to retaliate against an individual solely because he or she, complained of, or expressed an intent to report, what he or she believes in good faith to be harassment, whether to the Company or to an external agency. Likewise, also if he or she assisted another colleague to report, or participated in an investigation, proceeding or lawsuit relating to a complaint of harassment, including as a witness.





CONFIDENTIALITY

Delta will keep all complaints confidential to the extent reasonably practicable while still fulfilling its obligation to investigate and end any harassing, discriminatory or retaliatory conduct. In each investigation, we will do our best to respect the privacy of all persons involved.

It may be necessary to discuss the claims with person(s) with knowledge and the person(s) against whom the complaint was filed. Persons interviewed, including witnesses, may be directed not to discuss any aspect of the investigation with others and the failure to comply with a confidentiality directive may result in disciplinary action.





PERSONAL RELATIONSHIPS

This Policy does not cover colleagues' private, consensual choices regarding personal relationships. However, consensual personal relationships between colleagues have the potential for conflicts of interest.

For further information on the Company's policy on personal relationships between colleagues, please refer to the Conflict of Interest Section in the Conditions of Service Booklet.





MANAGERS' RESPONSIBILITIES

Prevention is the best tool to eliminate harassment in the workplace; however, no single person can prevent harassment. All colleagues are owners of this Policy. In addition to their obligations to report all incidents of harassment, all Delta Line Managers must:

- Read and understand this Policy and the implications of non-compliance;
- Ensure that colleagues in his or her team understand and comply with this Policy;
- Ensure that colleagues in his or her team know they can report any complaint regarding harassment or discrimination, without fear of victimization or retaliation;
- Know how and where to file complaints under this Policy and inform colleagues in his or her team how and where to file complaints;
- Ensure that this Policy forms part of induction training.





DISCIPLINARY AND OR CORRECTIVE ACTION

Any colleague found to have violated this Policy may be subject to appropriate disciplinary and/or corrective action. This may include, but is not limited to written or verbal reprimand, suspension, reassignment, demotion or termination of employment.

Referral to another appropriate authority for review for possible violation of local laws may also be required.





OUR STANDARDS

This Policy sets out Delta's minimum standards for addressing and preventing harassment in all Delta Workplaces. Individual Business Units, countries and/or business operations may implement additional policies addressing harassment, discrimination and/or retaliation, but only to the extent those policies are consistent with this Policy. The standards set out in this Policy may be higher and provide greater protection to Delta colleagues than some local laws. Accordingly, a colleague can violate this Policy even if he or she does not violate local laws.

Colleagues can rely on this Policy or their local policy or laws – whichever provides them more rights.

Nothing in this Policy is meant to conflict with local law, including labour laws, which can vary from country to country. To the extent that you perceive a conflict between this Policy and with local law, please seek guidance from your local legal team as to how this conflict has been resolved.

Colleagues represented by a labour organization retain all rights under their collective bargaining agreements and labour law including the right to use the grievance process.





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This Policy does not override any provisions of those collective bargaining agreements.

In the event of any dispute or ambiguity in the interpretation of this Policy, the same will be determined by Delta Corporation, whose decision shall be final and binding on the point.

Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any colleague under any other rules or law.

All investigations conducted by colleagues of the Company, whether sexual harassment or otherwise, shall be conducted in accordance with the dictates of natural law.





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