

1. ANTI-DISCRIMINATION, HARASSMENT AND BULLYING POLICY

1. INTRODUCTION

Goldminex is committed to maintaining a non-discriminatory and safe working environment free from all forms of discrimination, sexual harassment and bullying. The company expects all employees to behave in a professional manner and to treat each other with dignity and respect.

2. DISCRIMINATION

2.1. What is Discrimination?

Discrimination can be defined as:

- Less favourable treatment;
- Making assumptions about a person or groups of people (e.g. older workers are inflexible);
- Setting unreasonable (in relation to the position) conditions or requirements, which make it harder for a person or groups of people to comply with.

2.2. What is EEO (Equal Employment Opportunity)?

EEO is about:

- Treating all staff according to their job performance and their skills, qualifications, abilities and achievements;
- Not considering irrelevant personal characteristics;
- Providing an opportunity to compete for promotions, transfers, vacancies and career progression on the basis of merit;
- Respecting an individual;
- Ensuring both direct and indirect discrimination in employment is eliminated.

2.3. Types of Discrimination

In addition to any local acts regarding discrimination, the Company has a policy not to discriminate on the grounds of:

- Age
- Colour
- Physical features
- Race
- Gender
- Disability

- Marital or family status
- Pregnancy
- Sexual activity or sexual orientation
- Industrial activity / union membership
- Lawful religious or political belief or activity
- Citizenship
- Ancestry

An employer must act appropriately and immediately to prevent and/or to stop discrimination occurring.

3. SEXUAL HARASSMENT

Sexual harassment is not acceptable and will not be tolerated in the workplace. It creates an intimidating, hostile or offensive working environment and can substantially interfere with an individual's work. Furthermore, it affects workplace morale, undermines productivity, and provides an unnecessary distraction from work. It may cause reactions ranging from annoyance through to embarrassment, intimidation, humiliation, distress, anxiety and ill health.

3.1. What is Sexual Harassment?

Sexual harassment is behaviour of a sexual nature that is unwelcome, unasked for and unreturned. Sexual harassment can be physical, verbal or written. It can include words, statements or visuals that are transmitted by paper, phone, fax, e-mail, and office Intranets, videoconference or any other means of communication. In most jurisdictions it is unlawful to sexually harass another person. Sexual harassment is unlawful regardless of the gender or sexual orientation of the person who harasses and the person being harassed. Examples of harassment can include:

- Telling of sexual jokes
- Making offensive phone calls
- A request for sexual favours
- Unwelcome comments about a person's sex or private life
- Suggestive comments about a person's physical appearance
- Suggestive behaviour such as leering, ogling and obscene gestures
- Sexually offensive comments, anecdotes or jokes
- Displaying sexually offensive visuals, such as photos, posters, calendars, reading matter or objects
- Physical contact such as touching or fondling
- Indecent exposure or assault / rape (also criminal offences)

4. BULLYING

Bullying is the repeated and unreasonable behaviour directed towards an employee or group of employees that creates a risk to health and safety. It can include behaviour such as:

- Excluding someone from workplace activities

- Giving someone the majority of unpleasant tasks
- Verbal insults or humiliating through sarcasm or insults
- Intimidation

5. RESPONSIBILITIES OF ALL STAFF

All staff must be aware of the effect of their behaviour, and the behaviour of others in the workplace. An employee subjected to discrimination harassment or bullying should immediately make it clear to the offender that such behaviour is offensive and unacceptable and should promptly notify their manager.

Should an incident involve an employee's manager, then the incident should be brought to the attention of the Country Manager, Exploration Manager or Company Secretary.

Managers are expected to promptly deal with situations that have the potential to cause offence. They are also expected to ensure that staff are fully aware of the discrimination, sexual harassment and bullying policy.

Where there are any indications of discrimination, harassment or bullying occurring, or where an allegation is made, a Manager will take immediate steps to attempt to resolve the problem. An employee who has made a complaint should be assisted to define clearly the nature of the offensive behaviour and provide evidence, where possible, regarding the allegation. In the interests of natural justice, an employee about whom a complaint has been made should be informed of the substance of that complaint and given an opportunity to respond. At all stages, particular attention should be paid to the sensitive nature of cases involving these issues and the need to ensure, as far as possible, strict confidentiality.