
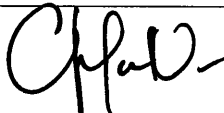


PROTASCO	HUMAN RESOURCES POLICY & PROCEDURE MANUAL	
Section 4	Non Discrimination Policy	Revision : Nil
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1. Policy Statement

Protasco ("The Group") is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, The Group expects that all relationships among persons in the office will be business-like and free of explicit bias, prejudice and harassment.

2. Objective

Our non-discrimination policy explains how we prevent discrimination and protect our employees, customers, and stakeholders from offensive and harmful behaviors. This policy supports our overall commitment to create a safe and happy workplace for everyone.

Any employee who has questions or concerns about these policies should talk with the Human Resources personnel.

3. Scope

This policy applies to all employees, contractors, visitors, customers and stakeholders.

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

4. Policy Elements

4.1 Equal employment opportunity

It is the policy of the Group to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other characteristic protected by law. The Group prohibits any such discrimination or harassment.

4.2 Retaliation

The Group encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of the Group to promptly and thoroughly investigate such reports. The Group prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

4.3 Harassment

Our non-discrimination (harassment) and sexual harassment policies go hand-in-hand. Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, colour, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that:

- a) has the purpose or effect of creating an intimidating, hostile or offensive work environment,
- b) has the purpose or effect of unreasonably interfering with an individual's work performance, or
- c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs, or negative stereotyping; threatening, intimidating, or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone (including voice messages), text messages, social networking sites or other means.

5. Action to prevent discrimination

To ensure that our conduct and processes are fair and lawful, we:

- Use inclusive language in job ads and include Employment Equal Opportunity statements
- Set formal job-related criteria to hire, promote, and reward team members
- Offer compensation and benefits according to position, seniority, qualifications, and performance, not protected characteristics
- Accommodate people with disabilities whenever possible
- Require managers to keep detailed records of their decisions concerning their team members and job candidates
- Organizing trainings on diversity, communication and conflict management to improve collaboration among employees of different backgrounds

6. Reporting an Incident of Harassment, Discrimination or Retaliation

The Group encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been the victim of such conduct should discuss their concerns with their immediate supervisor or human resources. See the complaint procedure described below.

In addition, the Group encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behaviour is unwelcome and to request that it be discontinued. Often this action alone will resolve the problem. The Group recognizes, however, that an individual may prefer to pursue the matter through complaint procedures.

7. Complaint Procedure

- Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor, or human resources.
- The Group encourages the prompt reporting of complaints or concerns so that rapid and constructive action can be taken before relationships become irreparably strained. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment.
- Any reported allegations of harassment, discrimination or retaliation will be investigated promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.
- The Group will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.
- Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.
- Misconduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include, for example, training, referral to counseling, or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay, or termination, as the Group believes appropriate under the circumstances.
- False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.

8. Variation

The Company shall reserve the right to amend, delete or augment this policy and guideline as and when necessary.

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