

DIGNITY AT WORK POLICY

Every employee of RA has the right to be treated with dignity and respect at all times. RA employees are required to conduct themselves in a manner which is entirely consistent with this general principle.

Any employee who believes that this elementary right has been infringed may make a formal complaint as outlined in the Procedure.

An employee whose wilful and deliberate conduct is in contravention of this policy may be disciplined and may also, as a result of this process, be issued with a formal warning, up to and including termination of contract, as merited by the facts of the case.

This Policy applies to everyone. There are no exceptions.

1. Procedure

1.1 HARASSMENT

Harassment is defined as any form of unwanted conduct related to any of the discriminatory grounds which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person.

These discriminatory grounds are as follows:

- 1.1.1 Gender
- 1.1.2 Civil status
- 1.1.3 Family status
- 1.1.4 Sexual orientation
- 1.1.5 Religion
- 1.1.6 Age
- 1.1.7 Disability
- 1.1.8 Race

1.2 EXAMPLES OF HARASSMENT

Harassment is inappropriate behaviour based on the relevant characteristic of the employee such as race, religion, age etc. The following are examples of inappropriate behaviour which may constitute harassment:

- 1.2.1 Verbal harassment (i.e. jokes, derogatory comments, ridicule)
- 1.2.2 Written harassment (i.e. text messages, emails or notice)
- 1.2.3 Physical harassment (i.e. jostling or shoving)
- 1.2.4 Intimidatory harassment (i.e. gestures or threatening poses)
- 1.2.5 Visual displays (i.e. posters, emblems or badges)
- 1.2.6 Persistent negative body language
- 1.2.7 Ostracising or excluding a person

1.3 WHAT IS BULLYING?

Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual's right to dignity at work.

A key characteristic of bullying is that it usually takes place over a period of time. It is regular and persistent inappropriate behaviour, which is specifically targeted at one employee or a group of employees. It may be perpetrated by someone in a position of authority, by employees against a manager, or by employees in the same grade as the recipient.

1.4 EXAMPLES OF BULLYING

The following are some examples of the types of behaviour which may constitute bullying:

- 1.4.1 Constant humiliation, ridicule, belittling efforts – often in front of others.
- 1.4.2 Verbal abuse, including shouting, use of obscene language and spreading malicious rumours.
- 1.4.3 Showing hostility through sustained unfriendly contact or exclusion.
- 1.4.4 Inappropriate overruling of a person's authority, reducing a job to routine tasks well below the person's skills and capabilities without prior discussion or explanation.
- 1.4.5 Persistently and inappropriately finding fault with a person's work and using this as an excuse to humiliate the person rather than trying to improve performance.
- 1.4.6 Constantly picking on a person when things go wrong, even when they are not responsible.

1.5 WHAT BULLYING IS NOT

The following does not constitute bullying:

- 1.5.1 An isolated incident of inappropriate behaviour but, as a one-off incident, is not considered to be bullying.
- 1.5.2 Fair and constructive criticism of an employee's performance, conduct or attendance.
- 1.5.3 Reasonable and essential discipline arising from the good management of the performance of an employee at work.
- 1.5.4 Actions taken which can be justified as regards the safety, health and welfare of the employees.
- 1.5.5 Legitimate management responses to crisis situations which require immediate action.

1.6 SEXUAL HARASSMENT

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. The unwanted conduct may include acts, requests, spoken words, gestures or the production, display or circulation of written words, pictures or other materials.

Sexual harassment may consist of a single incident or repeated inappropriate behavior. It may be targeted at one employee or a group of employees.

The following are some examples of inappropriate behavior, which may constitute sexual harassment:

- 1.6.1 Physical conduct of a sexual nature (i.e. such as patting, pinching, touching, brushing up against someone).
- 1.6.2 Verbal conduct of a sexual nature (i.e. unwelcome sexual advances, propositions, pressure for sexual activity, continued suggestions for social activity outside the workplace, after it's made clear they are unwelcome, unwanted or offensive flirtations, suggestive remarks, innuendos or lewd comments).
- 1.6.3 Non-verbal conduct of a sexual nature (i.e. display of pornographic or sexually suggestive pictures, objects, written materials, emails, texts).
- 1.6.4 Unwanted or derogatory comments about dress or appearance.
- 1.6.5 Leering, and suggestive gestures.

2. Roles and Responsibilities

2.1 EMPLOYER'S RESPONSIBILITIES:

This policy and procedure will be communicated throughout the company and all employees will be made aware of their responsibilities to create a working environment, free of bullying and harassment. Appropriate training will be provided to enable the lifting of awareness throughout the company on these subjects.

2.2 EMPLOYEE'S RESPONSIBILITIES:

All employees have a responsibility to help maintain a working environment in which the dignity of all individuals is respected. All employees must comply with this policy and ensure that their behaviour does not cause offence to fellow workers or any person with whom they come into contact with during the course of their work.

Employees should discourage bullying and harassment by objecting to inappropriate behaviour. Employees should inform a manager if they are concerned that a colleague is being bullied or harassed.

Manager's Responsibilities:

Managers have a particular responsibility to implement this policy and to make every effort to ensure that bullying or harassment does not occur, particularly in work areas for which they are responsible. Managers have an obligation to deal promptly and effectively with any incidents of bullying or harassment of which they are aware, or ought to be aware.

2.3 DEALING WITH THE PROBLEM

In most cases, it is to be expected that where an employee believes that they have a right to bring a complaint under this Policy that such an action be taken by that aggrieved employee, and that this will be the first step in the process towards investigation, consideration and resolution.

However, all employees, including Supervisors and Managers, have a duty to report or deal with any instance of conduct which is not consistent with the general scope and purpose of this Policy, irrespective of whether it has resulted in any formal complaint.

It is recognised that bringing a formal complaint, particularly against a Line Manager or colleague, is often the choice of last resort, and early informal attempts to diffuse or solve a problem may bring more lasting and more beneficial results. In dealing with formal complaints under this Policy, it is in everyone's best interest to ensure that matter is dealt with quickly and fairly and at the lowest level possible at which it can be resolved.

2.4 INFORMAL

If an employee (complainant) feels that they are being subjected to some form of action (or inaction) which is covered by this Policy, then they should inform the individual(s) responsible that their actions (or inactions) are causing offence, are unwanted, inappropriate and must cease. If the complainant feels that he/she is unable to confront the individual(s) in this way, then they may ask a colleague to intervene or assist on their behalf.

However, if, in the opinion of the complainant, a direct approach by themselves or even with the assistance of a colleague is not a desirable option, then they may go directly to having the complaint dealt with at Stage 1 of the formal process. However, all employees are reminded of the potential benefits of having the matter dealt with informally, where it is appropriate and potentially beneficial to do so. It is to be hoped that this informal approach will provide satisfactory results, as the accused may not be aware that their behaviour has caused offence.

Both the complainant, accused, and, where involved, the Supervisor or Manager, should make a note of the details of this approach.

Stage 1 - Formal

If the informal approach does not resolve the matter, (or if the employee wishes to opt out of the informal option) then the employee should put their complaint (preferably in writing), to her/his immediate Supervisor or Manager. A simple form has been designed for this process.

The immediate Supervisor or Manager is required to report back within one week, either in writing, or via discussion, or both. If it is not possible to respond within the specified time the employee will be given an explanation and told when a response can be expected.

Formal complaints made by an employee should be submitted to their line manager however, if there is a conflict of interest then the complaint should be elevated to the next level of management in-country or in Dubai. Again, if there is a direct conflict of interest or the complainant feels it is relevant to report directly to Dubai for whatever reason, then they should submit a report via the whistleblowing 'Ethicspoint' web page (<https://raints.whistlelink.com/>). If you prefer a more informal conversation with management in Dubai would be more suited to your issue(s), then you can contact the Compliance Manager, Head of Human Resources or any member of the Executive Management Team.

Depending on the nature and severity of the complaint, a full and thorough internal investigation will be launched whereby all relevant facts will be collated via witness reports and one-to-one interviews with all relevant parties to ascertain the facts surrounding the complaint.

In serious cases the accused may be suspended, on full pay, if this is considered necessary and helpful to an effective investigation.

If, following the investigation, the Company believes that the accused has no case to answer then they, and the complainant will be informed of this decision.

If, however, in the opinion of the Company, some form of harassment or inappropriate conduct has taken place, then the accused will be informed of this decision and appropriate action taken through the Disciplinary Procedure.

Such action may include:

1. A written warning (which, depending on the nature of the offence, may be final) with the consequences of future transgressions clearly stated; or
2. Dismissal.

If the matter is not satisfactorily resolved during the first formal stage, (and the complainant wishes to exercise a right of appeal as to the findings or conclusions of this stage) or if the subject of the complaint is (or includes) the employee's immediate Supervisor or Manager then the employee may elect to go to stage 2.

Stage 2 – Final Stage: Appeals Procedure

Following the result of a formal internal investigation, the complainant is not satisfied with the outcome, then they must raise a request for an appeal with the Head of Human Resources. The request should be in writing and need not contain a detailed statement of the case. The Head of Human Resources will undertake a review of the case within a reasonable amount of time, including the circumstances surrounding the complaint, the Decision itself, and may wish to speak with the investigator who carried out the investigation and the Director(s) who decided on the outcome of the complaint. This will assist in clarifying any issues and understand how the Decision was reached. After this procedure has been completed, the Head of Human Resources may wish to uphold the original Decision or, depending if there is any new material to consider, may wish to submit to the Director(s) to reconsider their Decision, where merited.

As the Director has full responsibility for handling the outcome of the complaint, their Decision will be final and binding.

There is no further right of appeal.

3. Safeguards

- 3.1 This procedure is to be confidential to all parties and the Company will not disclose information, except where disclosure is necessary for the purposes of investigating the complaint or taking relevant disciplinary measures.
- 3.2 No employee will be made to suffer as a consequence of taking any action under this procedure and where an employee feels that this safeguard has not been observed then they are requested to provide details, in writing to the Head of Human Resources. RA has a zero-tolerance approach to any acts of reprisals or retaliation against individuals making complaints. If, however, any submitted formal reports are intentionally false and made with the intent to place another individual(s) in trouble, then the author of such report(s) could be faced with internal disciplinary measures, up to and including dismissal.
- 3.3 If, in the opinion of the Company, it is in the best interests of all concerned that the complainant and the individual(s) who are the subject of the complaint are separated (e.g. moved to different working areas) and this is feasible, then unless there are particular circumstances suggesting the opposite, (for example the complaint is without foundation,

and significant ill feeling exists as a result) then it will not be the complainant who is moved.

- 3.4 Follow-up is important, and the complainant will be invited to discuss the situation at 1, 2 and 3- month intervals following the resolution of the matter. This discussion will focus on any matters of concern that the employee may have which remain outstanding or have been caused by the investigation and complaint.

Notes:

1. No employee will be reprimanded or made to suffer any form of retaliation from anyone as a result of seeking resolution of a complaint through this procedure.
2. An employee has the right to be accompanied (provided that they make a reasonable request to do so) at any hearings held in respect of the complaint. This is, however, restricted to a member of their trade union (full time official or “certified”) or a colleague and not someone acting in a representative capacity.
3. Records will be kept detailing the nature of the complaint, the response, any action taken and the reasons for it. These records will be kept confidential and retained in accordance with Data Protection principles.

Soraya Narfeldt
CEO

A blue ink handwritten signature, appearing to read 'Soraya Narfeldt', is written over a horizontal line.

Policy Implementation/ Review Date	Next Policy Review Date
January-2026	January-2027