



ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICY

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Purpose:

The Company is committed to providing a work environment free of discrimination and/or harassment. We prohibit discrimination/harassment in the workplace, whether committed by or against managers, co-workers, customers, vendors, or visitors. We want you to work and develop in an environment that is respectful and productive. Workplace discrimination or harassment based on an employee's race, color, religion, sex, national origin, citizenship, age status, sexual orientation, disability, marital status, or any other basis prohibited by law, will not be tolerated. The Company prohibits inappropriate conduct based on any of the above characteristics at work, on Company business, or at Company sponsored events.

Harassment/Discrimination

Harassment/Discrimination is behavior that is unwanted, unreasonable and offensive to the recipient, which creates an intimidating, hostile or humiliating work environment for that person. There are various types of harassment which can occur at work, these can be based on:

- Race, ethnic origin, nationality or skin color
- Gender and/or sexual orientation
- Religious or political convictions
- Membership or non-membership of a trade union
- Disabilities, illness, sensory impairments or learning difficulties
- Age

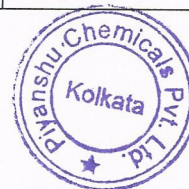
Harassment can occur between people of the same sex or opposite sex.

Sexual Harassment

Sexual harassment has been defined as unwanted and unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that:

- Is made either explicitly or implicitly a term or condition of employment; or
- Is used as the basis for employment decisions affecting such an individual; or
- Has the purpose or effect of substantially interfering with an individual's work performance and of creating an intimidating, hostile, or offensive work environment.

Date Of Issue	Prepared By Swapn Dutta	Checked By Netai Mahalanabis	Approved By Anshu Kejriwal
03.04.2023		N. Mahalanabis	





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The Company prohibits inappropriate conduct that is sexual in nature at work, on Company business, or at Company-sponsored events including the following:

- Comments, jokes, or degrading language or behavior that is sexual in nature;
- Sexually suggestive objects, books, magazines, photographs, cartoons, pictures, calendars, posters, electronic communications, or other material;
- Unwelcome sexual advances, requests for sexual favours, or any sexual touching;
- Offering favorable terms or conditions of employment or benefits in exchange for sexual favours or threatening or imposing less-favorable terms or conditions of employment if sexual favours are refused.
- Sexual harassment is prohibited whether it's between members of the opposite sex or members of the same sex.

Management and staff responsibility

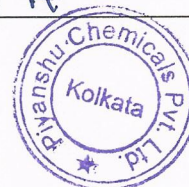
All managers have a key responsibility in establishing and maintaining a workplace free from personal discrimination/harassment. All managers are directly responsible for the conduct of their staff. All Rexam employees are expected to comply with this policy and that it is the personal responsibility of each employee to ensure that inappropriate conduct does not occur.


How complaints will be dealt with

Any claims of discrimination or harassment will be investigated promptly, and appropriate disciplinary action will be taken to eliminate inappropriate behavior. Creating a discrimination/harassment free work environment is every employee's responsibility. If you receive a complaint or observe or believe you're a victim of discrimination, sexual harassment or any other form of harassment at work, on Company business, or at any Company-sponsored function, you must immediately report it to one of the following:

- Your manager or another manager in your management chain
- Human Resources
- Complaint Box

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All complaints are treated with sensitivity and are kept as confidential as possible. You're not required to report your complaint to anyone who is the subject of it. For example, if your complaint concerns your manager, you can talk to someone in Human Resources. However, if anyone at work, on Company business, or at any Company-sponsored function engages in

Conduct that makes you feel uncomfortable, we encourage you to tell that person that the conduct is unwelcome, that you find it offensive, and that you request that it stop immediately. Human Resources will promptly investigate complaints. You must cooperate fully in such investigations. If warranted, the Company will take appropriate corrective action, up to and including termination of employment.

The Company prohibits any form of retaliation against you for making a report of discrimination or harassment or participating in the investigation of a complaint of discrimination or harassment. If you believe you have been subjected to retaliation, you can use any of the resources described above to report your concerns.

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