




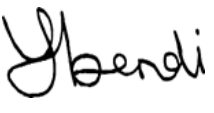
Seplat Energy Plc



Security Classification: **Restricted**

SEP-CHR-GEN-W00-0000


## Anti-Discrimination, Bullying and Harassment Policy

March 2023

Rev	Date	Description	Issued by	Checked by	Approved by
					
A01	03-02-2023	<b>Issued for Approval / Implementation</b>	Human Resources	Oby Ezeoke	Charles Gbandi


 	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	2 of 17

<u>Party</u>	<u>Name</u>	<u>Sign</u>	<u>Date</u>
<p><b>Revision Philosophy</b></p> <p>All draft documents for review will be issued at R01, with subsequent R02, R03, etc as required.</p> <p>All revisions/new policies approved for issue / implementation will be issued at A01, with subsequent A02, A03, etc. as required.</p> <p>Narrative sections revised from previous approved issues are to be noted in the table below and/or highlighted in the RH margin (using the appropriate revision status)</p> <p>Previous revision highlighting to be removed at subsequent issues.</p>			
<b>Revision History</b>			
<b>Revision No.</b>	<b>Date of issue</b>	<b>Reason for change</b>	
R01	03-02-2023	<ul style="list-style-type: none"> <li>• Introduction of Discrimination to the policy.</li> <li>• Rephrased the policy from Bullying and Harassment to Anti-Discrimination, Bullying and Harassment policy.</li> <li>• Added the clause: “This policy shall be read in conjunction with all other Company’s relevant policies, including but not limited to the Diversity and Inclusion Policy”.</li> </ul>	

	Document No.	SEP-CHR-GEN-W00-0000	Rev.	R01
	Document Title	Anti- Discrimination, Bullying and Harassment Policy	Page	3 of 17

## Contents

1.	Introduction and Purpose.....	4
2.	Applicability.....	4
3.	Responsibility.....	5
4.	Definitions.....	6
5.	Sexual Harassment.....	10
6.	Relevance of Motive.....	11
7.	Confidentiality.....	11
8.	Procedure for Making a Complaint.....	12
9.	Making an Appeal / Whistleblowing.....	13
10.	Duty to Report Discrimination, Bullying and Harassment.....	14
11.	Disciplinary Action.....	14
12.	Retaliation.....	14
13.	False Reporting.....	14
14.	Documentation and Record Keeping.....	14
15.	Seeking Clarification.....	15
16.	Review of this Policy.....	15
17.	Exceptions and Amendments to this Policy.....	15
18.	Appendix 1 – Illustration of Discrimination, Bullying and Harassment Procedure.....	17

	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	4 of 17

## 1 INTRODUCTION AND PURPOSE

SEPLAT recognises that its Employees are one of the Company’s greatest assets and stakeholders. The Company is committed to protecting and nurturing the diversity amongst its Employees in order to create a safe work environment. Our Code of Business Conduct requires every Director and Employee to follow the timeless, universal principle of treating each person with respect, whilst embracing a culture of diversity & inclusion. Negative conducts, such as Discrimination, Bullying and Harassment, contravene this principle and our value for diversity.

Discrimination, Bullying and Harassment creates a hostile work environment, and adversely impacts on productivity and Employee morale. SEPLAT will therefore enforce a zero-tolerance approach against any conduct that contravenes its commitment to diversity, including acts of Discrimination, Bullying and Harassment.

This Anti-Discrimination, Bullying and Harassment Policy (this “Policy”) has been developed to set the parameters within which the Company will deal with Discrimination, Bullying and Harassment in the workplace. The aims of this Policy are to:

- a) reinforce the Company’s commitment to diversity inclusion and mutual respect.
- b) create a platform for rewarding conduct that aligns with the Company’s value for diversity; and
- c) outline the Company’s zero tolerance approach to addressing all acts of Discrimination, Bullying and Harassment.

## 2 APPLICABILITY


This Policy applies to all Employees of SEPLAT, and any third party dealing with them.

This Policy applies to acts of Discrimination, Bullying and Harassment that occur: (a) inside or outside the work premises of SEPLAT or (b) during or outside of the normal business hours of SEPLAT, provided that the Respondent was acting in relation to or further to his/her employment or role in SEPLAT (e.g., conduct at an offsite meeting, training course, conference, work-related social event, etc.).


This policy shall be read in conjunction with all other Company’s relevant policies, including but not limited to the Diversity and Inclusion Policy.

## 3 RESPONSIBILITY

- 3.1. **The Review Panel** shall be responsible for the review, decision-making, and initiation of disciplinary action pursuant to this Policy.

	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	5 of 17

- 3.2. **The Director Corporate Services or the most senior HR Manager** shall be responsible for:
- a) ensuring that this Policy is updated as required to reflect current issues related to Discrimination, Bullying and Harassment
  - b) the day-to-day embedding, implementation, and strict enforcement of this Policy, including the conduct of training and the interpretation of this Policy. In so doing, the Director Corporate Service or most senior HR manager shall be responsible for:
    - i. explaining the Policy and complaints procedure to new Employees as part of their induction into the Company
    - ii. explaining the Policy to all Employees to ensure that they understand their roles and responsibilities and how the Complaints procedure operates
    - iii. monitoring any Complaint until its proper resolution and thereafter following up on the situation around the Complaint to ensure that the behaviour complained of does not recur
    - iv. responding promptly and discreetly to requests from Employees to intervene; and
    - v. maintaining a proper record of all Complaints that are brought to the Company's attention. The Director Corporate Services or most senior HR manager shall report these complaints on a bi-annual basis to the Senior Leadership Team.
- 3.3. **The Head, Business Integrity** shall be responsible for:
- a) investigating reports of Discrimination, Bullying and Harassment that are made through the Company's Whistleblowing channels
  - b) investigating reports of Discrimination, Bullying and Harassment that are escalated to the Business Integrity unit.
  - c)
- 3.4. **Managers and Supervisors** have a responsibility to make every effort to ensure that Discrimination, Bullying and Harassment does not occur, particularly in work areas for which they are responsible. Managers and supervisors have an obligation to deal seriously, promptly and effectively with any incidents of Discrimination, Bullying and Harassment of which they are aware or ought to be aware. In so doing, the Company requires all Managers and Supervisors to always ensure the following:
- a) Monitor the behaviour of new Employees during their probationary period to ensure compliance with this Policy
  - b) Promote awareness of (and participation in the embedding of) this Policy amongst Employees on an ongoing basis

	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	6 of 17

- c) Set a good example by treating all Employees and any other person with whom they come into contact in the workplace with courtesy, respect and fairness.
- d) Be vigilant for signs of Discrimination, Bullying and Harassment, and intervene before a problem escalates; and
- e) Respond sensitively to any Employee who makes a Complaint.


3.5. It is the responsibility of **all Employees** to help prevent Discrimination, Bullying and Harassment in the workplace by:

- a) embracing diversity in the Company
- b) recognising and valuing the skills and talents of others
- c) treating other Employees, any person they meet in the workplace, fairly and equitably with courtesy and respect
- d) reporting every act of Discrimination, Bullying and Harassment observed; and
- e) promoting the awareness of and compliance with this Policy, including participating in activities to embed this, Policy.

#### 4 **DEFINITIONS**

For purposes of this Policy, the following definitions of key terms shall apply:

- 4.1 **“Buddy”** means an Employee nominated by the Complainant or Respondent to provide support during the Review Process. e.g., Change Agents, Joint Consultative Committee (“JCC”) Representatives.
- 4.2 **“Bullying”** means any behaviour characterized as offensive, intimidating, malicious or insulting. An abuse or misuse of power through conducts that undermine, humiliate, belittle, or injure the recipient. Bullying can include the use of personal strength or the power to coerce through fear or intimidation, not necessarily from someone in a position of authority. Bullying may be physical, verbal or non-verbal. It can include conduct that is not face-to-face, including via text message, email and social media.”
- 4.3 **“Harassment”** means any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- 4.4 **“Discrimination”** means any distinction, exclusion or preference made on the basis of race, colour, gender, religion, political opinion, marital status, national extraction or social origin, ethnicity, which has the effect of nullifying or impairing equitable treatment of employees, contrary to the applicable Company policies.

	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	7 of 17



4.4 The terms “**Bullying**” and “**Harassment**” are often used interchangeably and there is typically a great deal of overlap. However, the following features are helpful in differentiating between bullying and harassment.

4.5

<b>Harassment</b>	<b>Workplace Bullying</b>
Has a strong physical component – e.g., contact, touch, intrusion into personal space, damage to possessions and sabotage of target’s work.	Almost always psychological, except in rare cases with male bullies.
The perpetrator tends to focus on individual difference as the object of harassment (e.g., sex, race, sexuality).	The target is usually discriminated against because they are competent or popular.
Harassment may occur once or several times, but the target is usually aware that it is harassment right from the beginning.	The target may not realise they are being bullied for weeks or months. Often the target will have a light-bulb moment when they realise that a series of often seemingly insignificant incidents amount to intimidation and victimisation.
Offensive vocabulary often used.	Tends to be characterised by a series of minor criticisms or false or unfair allegations. Offensive words are less commonly used than in harassment.
The aggressor attempts to possess the target.	Often, a bully will start by attempting to control and dominate the target. Later, they will try to drive them to break down or leave the organisation.
Harassment often takes place in public as a means of peer approval or image building.	Usually bullying takes place in private without witnesses.
Target seen as easily victimised.	Target seen as a threat that must be dominated.

4.5 Examples of behaviour that may amount to Bullying include but are not limited to:

S/N	Examples of Bullying
(a)	Intimidation


 	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	8 of 17

(b)	Verbal abuse or threats, including screaming or using offensive language
(c)	Unreasonably excluding or isolating a person from workplace activities
(d)	Inappropriately undermining responsibility and/or authority
(e)	Making subtle threatening comments regarding a subordinate’s upcoming performance appraisal
(f)	Abuse of authority or Company processes, including making false reports, misusing the appraisal process, etc
(g)	Withholding information essential to do a task properly
(h)	Copying emails that criticise an Employee to others who do not need to know
(i)	Making threats or comments about an employee’s job security without foundation
(j)	Blackmail or extortion
(k)	Leaving offensive items around your work area, after being notified of its offensive nature
(l)	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;
(m)	Constantly picking on a person when things go wrong even when he/she is not responsible.
(n)	Cyber bullying (the use of electronic communication to bully a person, typically by sending messages of an intimidating or threatening nature).
(o)	Physical abuse.

4.6 Examples of behaviour that may amount to Harassment include but are not limited to:

S/N	Examples of Harassment
(a)	Intrusion into the employee’s personal life
(b)	Belittling or trivializing the victim’s thoughts
(c)	Spreading malicious rumours
(d)	Opposing or challenging everything the victim says
(e)	Direct threats of intent to inflict harm
(f)	Threatening behaviour (shaking fists angrily)



	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	9 of 17

(g)	Intolerance toward religious customs
(h)	Racial jokes, slurs, insults.
(i)	Degrading stereotypical comments
(j)	Offensive jokes
(k)	Sharing humiliating things about the victim by mass email or mass chat
(l)	Send harassing instant messages or text messages directly to the victim
(m)	Inappropriate sexual touching, gestures,
(n)	Invading personal space in a sexual way
(o)	Threatening, yelling, insulting or cursing at a victim in public or in private.
(p)	Physical attacks (hitting, shoving, kicking)


Harassment often stems from discrimination based on:

- (a) Gender
- (b) Ethnicity
- (c) Religion
- (d) Marital Status
- (e) Pregnancy/Maternity
- (f) Political Affiliation
- (g) Age
- (h) Facial Appearance (Beard or Tribal Marks)
- (i) Disability
- (j) Race
- (k) Sexuality

#### 4.7 Implication of Discrimination, Bullying and Harassment

Discrimination, Bullying and harassment can damage the health, confidence, morale, and performance of employees who are affected by it. They are both unlawful under our Constitution. They may also be civil or criminal offences and contravene health and safety law.

Quite apart from the legal implications, Discrimination, harassment, and bullying are contrary to the standards of behaviour that we expect of our employees. These types of behaviour are unacceptable in our workplace and are not permitted or condoned. We will treat such behaviour as misconduct which may warrant dismissal from employment.

	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	10 of 17

**4.8 The following behaviours do not constitute Discrimination, Bullying and Harassment:**

- (a) Reasonable management practices, including competence and/or performance management and disciplinary procedures.
- (b) A directive to carry out assigned duties and reasonable instructions; and
- (c) A directive to comply with SEPLAT’s rules, policies, and procedures.

4.10 **“Complainant”** means a person who complains of or brings a complaint on behalf of one who alleges Discrimination, Bullying and Harassment in SEPLAT and makes a report pursuant to this Policy.

4.11 **“Complaint”** means a claim of Discrimination, Bullying and Harassment that is made pursuant to this Policy.

4.12 **“Employee(s)”** for the purpose of simplicity only, means someone employed by SEPLAT and non-Employees such as: contract staff, agents and consultants working for SEPLAT.

4.13 **“Senior Leadership Team”** means the Senior Management Team of SEPLAT.

4.14 **“Respondent”** means a person against whom a Complaint has been made, pursuant to this Policy.

4.15 **“Review Process”** means the process of investigating all Complaints, as outlined in Sections 8 and 9 below.

4.16 **“Review Panel”** means the Discrimination, Bullying and Harassment Review Panel, which shall, at a minimum, consist of the following individuals (or their nominees):


- (a) Director Corporate Services representing HR
- (b) Director Legal/ Company Secretary
- (c) Head, Business Integrity

The Review Panel may from time to time invite the appropriate Senior Manager(s) to play an advisory role.

Where any member of the Review Panel is a Respondent to a Complaint, then such member shall not act as a member of the Review Panel for purposes of the Complaint, and the Chief Executive Officer of SEPLAT (**“CEO”**) shall appoint a suitable replacement.

Any member of the Panel who is a close ally of the Respondent may be given the opportunity to recuse his/herself from the proceedings to maintain objectivity.

4.17 **“SEPLAT” or “the Company”** means Seplat Energy Plc and all of its subsidiaries, as appropriate to the circumstances.

	Document No.	SEP-CHR-GEN-W00-0000	Rev.	R01
	Document Title	Anti- Discrimination, Bullying and Harassment Policy	Page	11 of 17

## 5 SEXUAL HARRASSMENT

5.1 **“Sexual harassment”** is any form of unwanted verbal, written 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 material. Sexual harassment may consist of a single incident or repeated inappropriate behaviour. It may be targeted at one person or a group of persons.

5.2. **Examples of Sexual Harassment:** The following are some examples of inappropriate behaviour which may constitute sexual harassment. These examples are illustrative but not exhaustive:


- a) Physical conduct of a sexual nature, e.g., unwanted physical contact such as unnecessary touching, patting, or pinching or brushing against another person’s body.
- b) Verbal conduct of a sexual nature, e.g., unwelcome sexual advances, propositions, or pressure for sexual activity, continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome.
- c) Unwanted and offensive flirtations, suggestive remarks, innuendos, or lewd comments.
- d) Non-verbal conduct of a sexual nature, e.g., the display of pornographic or sexually suggestive pictures, objects, written materials, emails, or text-messages.
- e) Unwanted or derogatory comments about dress or appearance.
- f) Leering and suggestive gestures.

5.3 Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. SEPLAT recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

5.4 SEPLAT recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

5.5 All sexual harassment is prohibited whether it takes place within SEPLAT premises or outside, including at social events, business trips, training sessions or conferences sponsored by SEPLAT.

5.6 Anyone, including employees of SEPLAT, clients, customers, contractors or visitors who sexually harasses another will be subject to disciplinary action including but not limited to summary dismissal.

	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti-Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	12 of 17

5.7 Complaint Procedure for Sexual Harassment: In addition to the procedure stipulated in Sections 8 and 9 of this Policy, anyone who is subjected to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. If a victim cannot directly approach an alleged harasser, he/she should follow the complaint procedure in Sections 8 and 9 of this Policy.

5.8 SEPLAT understands the need to support victims in making complaints. SEPLAT recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. Employees are entitled to seek guidance and counselling under the Company’s Employee Assistant Program.

**6 RELEVANCE OF MOTIVE**



The intention of the person engaging in the unwelcome behaviour is irrelevant, the effect of the behaviour on the employee concerned is what is important. All allegations of Bullying and Harassment will be dealt with seriously, promptly and in confidence. The need to maintain confidentiality will be paramount, except in circumstances where the alleged incident is serious enough to pose a risk to the Complainant or another person.

**7 CONFIDENTIALITY**

All allegations of Discrimination, Bullying and Harassment will be dealt with seriously, promptly and in confidence. The need to maintain confidentiality will be paramount, except in circumstances where the alleged incident is serious enough to pose a risk to the Complainant or another person.

**8 PROCEDURE FOR MAKING A COMPLAINT**

Due to the seriousness with which SEPLAT views Discrimination, Bullying and Harassment, different levels of reporting are in place as a mechanism for dealing with Complaints. These levels seek to ensure minimal stress to the persons involved, timely resolution of Complaints, and a degree of flexibility appropriate to individual circumstances. It should be handled in line with Company’s grievance framework. The person who investigates the complaint should be neutral and not involved in the complaint.

 	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	13 of 17

### **GRIEVANCE PROCEDURE**

For the purpose of this policy, the term "GRIEVANCE" refers to any ground of complaint arising out of interpretations or applications of the terms and conditions of employment of the Company's employees.

To this end, the following procedure will apply:

8.1 **Step 1 – Report to Line Manager.** An employee who has a grievance or claim will make this known in the first instance to his immediate Line Manager. The immediate Line Manager will discuss the grievance or claim with the employee concerned and if necessary, seek information within the Department to resolve the issue not later than two (2) full working days from the time it was raised with him by the employee.

8.2 **Step 2 – Report to Line GM/Head of Directorate.** Should the grievance or complaint remain unresolved at the end of Step 1, the Employee may then refer the matter to the Line GM or Head of Directorate concerned. The Line GM/Head of Directorate will examine the issue with the aim of resolving the matter not later than four (4) full working days from the time the issue was raised with him.


Both the Complainant and Respondent have the right to be accompanied by witnesses at all grievance proceedings.

8.3 **Step 3– Report to Human Resources.** An Employee may raise a Complaint to Human Resources under any of the following circumstances:

- (a) if the Employee does not wish to follow the mediation procedure outlined in Sections 8.1 to 8.3 above; or
- (b) if processes described in Sections 8.1 to 8.3 has failed to resolve the Complaint; or
- (c) if the Respondent is the Employee's Line Manager or Line General Manager.

8.4.1 To make a Complaint to Human Resources, the Employee should send the details of the Complaint via email to his/her Human Resources Business Partner. Complaints may be difficult to investigate if the Complainant does not provide sufficient information, such as:

- (a) nature of the incident
- (b) people involved
- (c) date(s) of incident
- (d) place of occurrence

	Document No.	SEP-CHR-GEN-W00-0000	Rev.	R01
	Document Title	Anti- Discrimination, Bullying and Harassment Policy	Page	14 of 17

- (e) Witnesses (if any)
- (f) how the incident occurred; and
- (g) any other useful information

- 8.4.2 Upon receipt of a Complaint, the Human Resources Business Partner shall do the following:
- (a) promptly send an appropriate acknowledgement to the Complainant and, if necessary, discuss with the Complainant for clarification
  - (b) notify the Respondent of the Complaint and request a formal response within 3 working days
  - (c) take immediate steps to protect the Complainant from further acts of Bullying and Harassment
  - (d) advise the Complainant and the Respondent of their right to each nominate a Buddy
  - (e) follow the Human Resources procedures for reviewing and resolving reports; (f) maintain proper documentation of the review process and resolution.

## 9 MAKING AN APPEAL / WHISTLEBLOWING


- 9.1 A Complainant or Respondent who is not satisfied with the outcome of the Review Process should contact any staff of Business Integrity Unit or make an anonymous report via the **SEPLAT Whistleblowing Hotline on 0800 444 1234 (SpeakUp@seplatpetroleum.com) or the KPMG ethics line on 0703 000 0026 (kpmgethicsline@ng.kpmg.com)**. Please be assured that all reports to the Whistleblowing Hotline will be treated in strict confidence.
- 9.2 The Business Integrity Unit will act to investigate, and the findings would be submitted to the Review Panel for necessary action.

## 10 DUTY TO REPORT DISCRIMINATION, BULLYING AND HARASSMENT

- 10.1 SEPLAT requires each Employee to report any act of Discrimination, Bullying and Harassment that is observed. Any failure to report observed acts of Discrimination, Bullying and Harassment is a violation of this Policy and may be considered as contributory to the act. This means that the Employee in violation may be subject to disciplinary action.

## 11 DISCIPLINARY ACTION

If an allegation of Discrimination, Bullying and Harassment is proven under Sections 8 and 9 of this Policy, then the Respondent will be subject to disciplinary action including but not limited to summary dismissal.

	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	15 of 17

12      **RETALIATION**

Employees must not victimise or otherwise subject another person to detrimental action as a consequence of that person raising, providing information about, or otherwise being involved in the resolution of a Complaint under this Policy.

13      **FALSE REPORTING**

Making false reports can be a form of Discrimination, Bullying and Harassment. Therefore, SEPLAT will also take very seriously any malicious or, in its opinion, any unwarranted allegations of Discrimination, Bullying and Harassment or inappropriate behaviour, as these can have a serious and detrimental effect on the Respondent. Should these occur, SEPLAT will take appropriate disciplinary action where necessary.

14      **DOCUMENTATION AND RECORD KEEPING**

14.1      The Policy & Employee Relations Manager will maintain register containing all Complaints that are brought to HR, and the Head of Business Integrity shall maintain a register for complaints made directly to BI. Both the Policy & Employee Relations Manager and Head of Business Integrity have the responsibility of updating the register. .

14.2      The register of Complaints will primarily include a summary of the Complaints, whether it was investigated, the process followed, and findings of the investigation and any action taken as a result of the investigation.



15      **SEEKING CLARIFICATION**

15.1      Employees who are uncertain whether an act constitutes Discrimination, Bullying and Harassment or require other clarification should contact their Human Resources Business Partner, any staff of Policy & Employee Relations Unit, Change Agent, JCC Representative, any staff of the Business Integrity Unit, or unanimously using the Whistleblowing lines outlined in Section 9.1 above.

15.2      The Director Corporate Services will ensure that the persons highlighted in Section 15.1 above are properly and regularly trained to play their respective roles outlined in this Policy.

16      **REVIEW OF THIS POLICY**

The Review Panel led by the Director Corporate Services will review this Policy every two (2) years or when there is a new regulation affecting the content of the Policy. The goal of each



 	<b>Document No.</b>	SEP-CHR-GEN-W00-0000	<b>Rev.</b>	R01
	<b>Document Title</b>	<b>Anti- Discrimination, Bullying and Harassment Policy</b>	<b>Page</b>	16 of 17

review shall be to ensure that this Policy continues to meet its objectives, SEPLAT legal obligations, aligns with the International Labour Organization Standards and reflect best practice.

17 **EXCEPTIONS AND AMENDMENTS TO THIS POLICY**

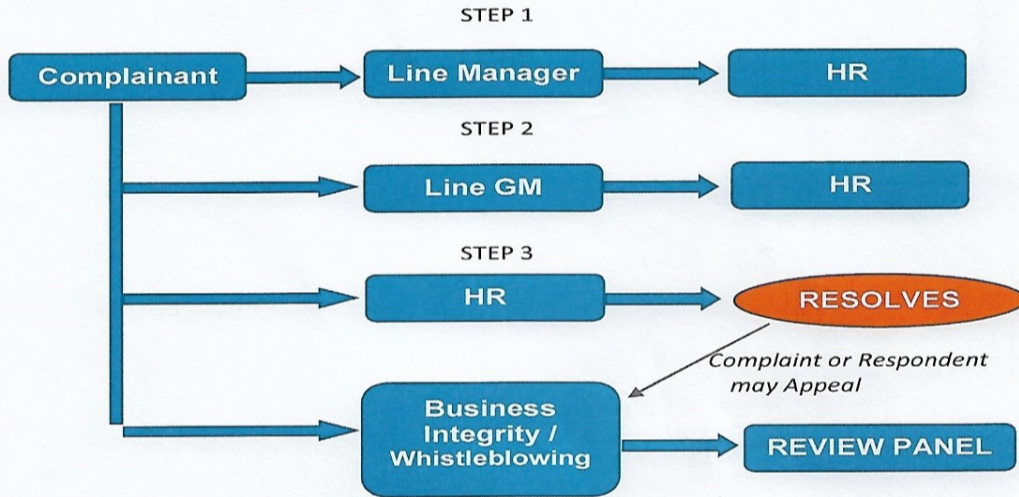
Any exception or amendment to this Policy must be approved in advance by the CEO



 	Document No.	SEP-CHR-GEN-W00-0000	Rev.	R01
	Document Title	Anti-Discrimination, Bullying and Harassment Policy	Page	17 of 17

**Appendix 1:**

**Appendix 1**  
***Illustration of Bullying and Harassment Complaint Procedure***



*For more information, please read Sections 8 and 9 of this Policy or seek clarification (Section 15.1).*