

Raya Anti-Harassment Policy


ANTI-HARASSMENT POLICY | DOCUMENT CONTROL | APRIL 2022

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Anti-Harassment Policy

Anti-Harassment Policy	Issue No. 01	
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1. Introduction

In alignment with our vision; “being a market leader no matter where we are” and Employee Value Proposition (EVPs) which are learning and progression. Raya fosters a work environment which is designed to permit and encourage each employee to achieve his/her highest level of personal productivity and quality of life. This environment should support, nurture, and reward career goals.

2. Purpose

Raya is committed to providing a workplace in which employees are treated in a non-discriminatory manner. This policy strictly prohibits acts of discrimination, harassment, sexual misconduct, or retaliation by, or against, our employees.

3. Scope

This policy applies to all employees, and prohibits such discrimination, harassment, sexual misconduct, or retaliation by any employee.

4. Eligibility

Employees, vendors and/or other visitors who believe that they have been subject to discrimination, harassment, sexual misconduct, or retaliation.

5. Responsibilities

LOB HR Head

- Handles the complaint process from beginning to end.
- Aligns with all concerned stakeholders when handling the complaints.
- Determines taking informal or formal resolution depending on the case.
- Determines if there is sufficient information to suggest that a policy violation may exist or not.
- Takes an appropriate disciplinary action proportionate to the severity of the violation if a prohibited harassment has occurred.

Corporate HR Head

- If the employee wishes to report a claim of harassment to corporate office, he/she should send an email to the Head of HR of Raya Holding.
- The Head of HR of Raya Holding to direct the LOB HR Head to take an appropriate disciplinary action proportionate to the severity of the violation if a prohibited harassment has occurred.

6. General Guidelines

- Individuals who witness what they believe may be discrimination, harassment, sexual misconduct, or retaliation against another individual in violation of this Policy are encouraged to report their concerns as soon as possible as described in Section 6 (Standard Operating Procedures), so that complaints and problems can be quickly and fairly resolved.
- Individuals reporting through email may do so anonymously but are encouraged provide as much detailed information as possible to allow fair investigation and respond as appropriate. Raya may be limited in its ability to investigate an anonymous or third-party report unless sufficient information is provided. No disciplinary action will be imposed based solely upon an anonymous complaint that cannot be substantiated by other evidence.
- Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal resolution.

7. Standard Operating Procedures

In violation of this policy are encouraged to report, as soon as possible, their concerns following one of the two processes below; depending on what the complainant or the respondent believes is more relevant to the situation.

Internal process (Per LOB):

STEP 1: If the employee wishes to report a claim of harassment, he/she should speak with his/her immediate supervisor, the Head of Human Resources, or the CEO of the Line of Business.

STEP 2: The Head of HR of the LOB will follow one of the following two resolutions:

A. Informal Resolution:

Informal resolution is a possible alternative to the formal complaint resolution process if both the Complainant and the Respondent consent. As part of the intake process, the Head of HR will determine if informal resolution is appropriate based on the nature of the alleged misconduct. Corrective actions are generally not pursued as the result of an informal resolution process, though the parties may agree to appropriate remedies. The Head of HR will keep records of any resolution that is reached. The Head of HR reserves the right to cancel informal resolution if sufficient evidence suggests a formal investigation or other sanctions or remedies may be necessary and appropriate. It is not necessary to pursue informal resolution first to make a formal complaint, and anyone participating in informal resolution can stop that process at any time and request to continue through the formal process.

B. Formal Resolution: -

1. Submitting a Complaint

Any individual who believes that the policy has been violated should submit a written complaint. Complaints that are not appropriate for informal resolution will be resolved using this formal complaint process.

2. Complaint Intake

Following receipt of complaint, the Head of HR will normally, within five (5) business days, make an initial determination as to whether there is sufficient information to suggest that a policy violation may exist. If there is sufficient information to suggest that a policy violation exists, and if informal resolution is not being pursued, an investigation will begin. LOB HR Head needs to notify the CHRO of Raya Holding that a formal investigation will start.

3. Interim Action

The Head of HR may implement interim action upon notice of alleged discrimination, harassment, and/or retaliation. Interim actions include, but are not limited to, interim suspension, an employee pending the completion of the investigation and procedures. During an interim suspension, an employee, will be denied access to workplace building, Raya HQ & any other Raya facilities, or participating in any event related to Raya.

4. Investigation

a. The Head of HR will gather information about the alleged violation. The gathering of information will be thorough, typically entail interviews with relevant parties and witnesses, and obtaining available evidence that can be physical, electronic, or documentary. All interviews need to be documented; and records and reports in relation to the investigation must be confidentially filed.

b. The investigation should be concluded within 10 working days from incident report date, which can be extended as necessary for appropriate cause by the Head of HR.

STEP 3: If the HR determined that a prohibited harassment has occurred, an appropriate disciplinary action proportionate to the severity of the violation will take place without prejudice to the applicable relevant laws. The disciplinary action may include, but are not limited to, verbal or written warning, required counseling, training, reassignment, suspension with or without pay, and/or termination in accordance to the labor sanctions list and termination procedures. LOB HR to notify the CHRO of Raya Holding with the results of the investigation and the action taken.

ANNEX I

Definitions of the Policy

A. Discrimination

Is defined as, but is not limited to, conduct directed at a specific individual or a group of identifiable individuals that subjects the individual or group to treatment that adversely affects their employment because of their sex, gender, marital status, pregnancy, race, color, ethnicity, age, national origin, disability, religion, gender identity, or expression, or any other protected characteristic under Egyptian law.

B. Harassment

Is defined as, but is not limited to:

a) any type of behavior that is based on sex, gender, marital status, pregnancy, race, color, ethnicity, age, national origin, disability, religion, gender identity, or expression, or any other protected characteristic under Egyptian law and that

b) is so severe or persistent that it interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment. Harassment when directed at an individual because of sex, gender, marital status, pregnancy, race, color, ethnicity, national origin, disability, religion, gender identity or expression, or any other protected characteristic under Egyptian law may include, but is not limited to:

- Unwanted physical contact, bullying, or intimidation of any person(s);
- Use of nicknames, inappropriate jokes, or comments;
- Harassing telephone calls, e-mails, letters, notes or other forms of communication;
- and, any conduct that may create a hostile working environment.

C. Sexual Harassment

Is defined to include, but is not limited to, obscene or harassing telephone calls, e-mails, letters, notes or other forms of communication; unwelcome sexual advances; requests for sexual favors; sexual violence; and other behavior of a sexual nature when:

- Submission to such conduct is made implicitly or explicitly a term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for personnel decisions; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive working environment.
- Repeatedly asking someone on a date after an initial invitation is declined;
- Spreading malicious sexual rumors among other workplace members in a way that is likely to cause embarrassment or reputational damage.
- Distribution of photographs or recordings of sexual activity or nudity

D. Retaliation

Is defined as adverse action taken against an individual in response to, motivated by or in connection with an individual's complaint of discrimination or discriminatory harassment, participation in an investigation of such complaint and/or opposition to discrimination or discriminatory harassment in the workplace setting

Approval

Version	Prepared by	Reviewed by	Approved by	Review Date
1.1	Human Resources	Hazem Abdel Hady, CHRO	Ahmed Khalil, CEO	April 2022