

# Human Rights Policy

Human rights are the basic political, civil, economic, labour, social and cultural rights and freedoms to which all people are entitled, without discrimination. It is expected that businesses respect human rights throughout the value chain. We believe that respecting human rights and contributing to the realisation of rights is not only critical to the sustainable operation of our business, it is the right thing to do. We see human rights as critical to our ability to contribute meaningful and ongoing social value to our stakeholders. Simply put, our success depends upon how well we respect the rights of individuals and groups who interact with and are impacted by our business operations and relationships. We demonstrate our commitment to respecting human rights by:

- ▶ Respect internationally recognised human rights, as in the Universal Declaration on Human Rights.
- ▶ Complying with Maltese laws and regulations.
- ▶ Operating in a manner consistent with the United Nations (UN) Guiding Principles on Business and Human Rights and the 10 UN Global Compact Principles.
- ▶ Operating in a manner consistent with the terms of the ILO Declaration on Fundamental Principles and Rights at Work, including the four Core Labour Standards the subject of the ILO Conventions upon which the Declaration is based, concerning:
  - ▶ freedom of association and the effective recognition of the right to collective bargaining;
  - ▶ the elimination of all forms of forced or compulsory labour;
  - ▶ the effective abolition of child labour; and
  - ▶ the elimination of discrimination in respect of employment and occupation.

We are committed to respecting and contributing to the realisation of all human rights. These include rights related to:

- ▶ workplace health, safety and labour conditions;

- ▶ freedom from discrimination based on personal attributes unrelated to job performance, such as race, ethnicity, gender identity, sexual orientation, intersex status, physical or mental disability, mental illness, relationship status, religion, political opinion, pregnancy, breastfeeding or family responsibilities;
- ▶ Culture, identity, traditions and customs; and
- ▶ Communities / stakeholders near our operations.

Our code of conduct sets our human rights commitments and the standards of behaviour for our people, as well as our expectations for all third parties we deal with, including suppliers, contractors and customers, community partners and governments.

## **1. Prohibited conduct:**

Eden Leisure Group upholds and supports the right to equal treatment without discrimination or harassment. This Policy prohibits discrimination or harassment on the basis of the following grounds, and any combination of these grounds:

- ▶ Age
- ▶ Creed (includes religion)
- ▶ Sex (including pregnancy and breastfeeding)\*
- ▶ Gender Identity\* and Gender Expression\*
- ▶ Sexual Orientation\*
- ▶ Family status (such as a parent-child relationship)
- ▶ Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship)
- ▶ Disability (including mental, physical, developmental or learning disabilities)
- ▶ Race
- ▶ Ancestry
- ▶ Place of origin
- ▶ Ethnic origin
- ▶ Citizenship
- ▶ Colour
- ▶ Association or relationship with a person identified by one of the above grounds

Anyone at ELG found to have engaged in conduct constituting discrimination and/or harassment may be subject to disciplinary action, up to and including termination

## **2. Reporting workplace harassment**

ELG encourages the reporting of all incidents of harassment and discrimination, regardless of who the alleged offender(s) might be.

All employees have a right to freedom from reprisals or threat of reprisals for refusing to accept harassment in any form, for making a formal complaint or cooperating in an investigation.

### *2.1 How to Report Workplace Harassment:*

Employees can report incidents or complaints discrimination, and/or harassment verbally or in writing.

The report of the allegation(s) should include the following information:

- ▶ Name of person who allegedly experienced discrimination and/ harassment and contact information.
- ▶ Name of alleged harasser, position and contact information (if known).
- ▶ Names of the witness (if any) or other person with relevant information to provide and contact information (if known).
- ▶ Details of what happened including date(s), frequency and location(s) of the alleged incident(s).
- ▶ Any supporting documents the person who complains of discrimination and/or harassment may have in his/her possession that are relevant to the complaint.
- ▶ List documents a witness or another person may have in their possession, relevant to the complaint.

### *2.2 Who to Report Workplace Harassment To:*

An incident or complaint of workplace harassment should be reported as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated in a timely manner.

Complainants are encouraged to report any incidents or complaints of discrimination and/or harassment to the HR manager. If the HR manager is the person engaging in the discrimination/ harassment, contact a member of senior management.

The HR manager shall be notified of the workplace harassment incident or complaint so that they can ensure an investigation is conducted that is appropriate in the circumstances. The HR manager will be responsible for investigating the specific complaint promptly.

## **3. Investigating complaints**

### *3.1 Commitment to Investigate*

ELG will ensure that an investigation appropriate in the circumstances is conducted when the HR manager, manager or supervisor receives a complaint of workplace harassment. Complaints or incidents of workplace harassment will be investigated in a fair, respectful and timely manner.

### *3.2 Who Will Investigate*

The CEO/COO will determine who will conduct the investigation into the incident or complaint of workplace harassment. Depending on the allegations and the people involved, the investigation may be referred to an external investigator to conduct an impartial investigation.

### *3.3 Timing of the Investigation*

The investigation must be completed in a timely manner, generally within 90 days or less, unless

there are extenuating circumstances (i.e. illness, complex investigation) warranting a longer investigation.

### *3.4 Results of the Investigation*

After an investigation is completed, the parties to a complaint may be informed in writing of the results of the investigation and any corrective action taken or will be taken by ELG.

### *3.5 Confidentiality*

Information about complaints and incidents shall remain confidential. Information obtained about an incident or complaint of workplace harassment, including identifying information about any individuals involved, will not be disclosed unless disclosure is necessary to protect employees, to investigate the complaint or incident or to take corrective action or otherwise as required by law.