



FIRST PACIFIC COMPANY LIMITED

第一太平洋有限公司

(Incorporated with limited liability under the laws of Bermuda)

Website: www.firstpacific.com

(Stock Code: 00142)

RESPECT IN THE WORKPLACE POLICY

This policy supports First Pacific's Code of Conduct (Code) and must be read in conjunction with the Code.

1. INTRODUCTION

First Pacific's Respect in the Workplace Policy expresses our commitment to maintain a workplace that's free of harassment and bullying, so our employees can feel safe and treated with respect even as they treat others with respect and dignity. We will not tolerate anyone intimidating, humiliating or sabotaging others in our workplace. We also prohibit willful discrimination as described in First Pacific's [Diversity and Equal Opportunity Policy](#).

This Respect in the Workplace Policy applies to all our employees and anyone else whom employees come into contact with at work. The Human Resources Department is primarily responsible for communicating this policy and overseeing its implementation.

2. DEFINITIONS

Harassment includes intimidation, direct insults, malicious gossip and victimization. It is 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. We can't create an exhaustive list, but here are some instances that we consider harassment:

- Sabotaging someone's work on purpose;
- Racist abuse, insults, taunts or jokes;
- Threatening behaviour of any kind;
- Bigoted behaviour towards others, such as mocking a disability;
- Engaging in frequent or unwanted advances of any nature;
- Commenting derogatorily on a person's ethnic heritage or religious beliefs;
- Starting or spreading rumors about a person's personal life; and
- Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g., bringing coffee) against their will.

Workplace bullying is repeated, unreasonable behaviour directed to a person in the workplace which is intimidating, cruel, offensive, humiliating or malicious and is actually or potentially harmful. It may be physical or non-physical, verbal or non-verbal. It need not be face to face. It can be by text message, note, email or social media. Workplace bullying includes but is not limited to:

- Physical or psychological threats;
- Overbearing or intimidating levels of supervision;

- Derogatory remarks about a person or their performance;
- Shouting or using an intimidating tone or patronising words;
- Picking on a person in front of others or in private;
- Spreading rumours about or insulting a person;
- Blocking a person's promotion or training opportunities;
- Ignoring or excluding a person from work activities or work-related social events;
- Setting a person up to fail by overloading the person with work or setting impossible deadlines; and/or
- Regularly making a person the butt of jokes.

Fair and reasonable counselling of a person about underperformance is not workplace bullying. Nor are investigating complaints, disciplinary action for misconduct and normal supervision and work directions.

Sexual harassment is illegal, and we will seriously investigate relevant reports. If an employee is found guilty of sexual harassment, they will be terminated under the terms of First Pacific's [Sexual Harassment Policy](#).

3. POLICY

All First Pacific staff, contractors, and suppliers have a responsibility to respect the rights and sensitivities of others. We expect our people to contribute to an environment of trust and respect and to conduct themselves in a manner which is neither offensive nor reasonably perceived by others to be offensive.

How to address harassment and bullying in the workplace

If you're being harassed or bullied, whether by a colleague, customer or vendor, you can choose to talk to any of the following:

- **Offenders.** If you suspect that an offender doesn't realize they are guilty of harassment, you may talk to them directly in an effort to resolve the issue. This procedure may be appropriate for cases of minor harassment (e.g., inappropriate jokes between colleagues). Avoid using this approach with outside parties or stakeholders;
- **Your manager.** If outside parties, stakeholders or team members are involved in your claim, you may reach out to your manager. Your manager will assess your situation and contact the Human Resources Department for follow-up; and
- **the Human Resources Department.** Feel free to reach out to the Human Resources Department in any case of harassment no matter how minor it may seem. For your safety, contact the Human Resources Department as soon as possible in cases of serious harassment (e.g., sexual advances) or if your manager is involved in your claim.

Whomever you speak with, you should describe the offensive behaviour and explain that it is unwelcome or makes you uncomfortable. You should record in writing the name of the other person, what happened, when and where it happened, who (if anybody) witnessed it and how you responded.

When a complaint is made to your manager or the Human Resources Department, the Human Resources Department will conduct a preliminary inquiry to determine whether there are grounds for an investigation. If the Human Resources Department determines that there are no grounds to continue, the investigation will not proceed. If the Human Resources Department determines that there are such grounds, it will form an investigation team to determine whether harassment or bullying has taken place.

The investigation team may interview the complainant, the person against whom the complaint has been made and witnesses proposed by either of them. If the complaint is found by the investigation team to be valid, the person making the complaint will be notified and will be told what action is proposed. However, action taken against the person against whom the complaint is made may remain confidential as between that person and the Human Resources Department. If the complaint is found by the investigation team to be invalid, the investigation will be closed.

If an investigation does not proceed because the Human Resources Department determines that there are no grounds for an investigation or an investigation is closed because the complaint is found by the investigation team to be invalid, nothing will be placed on the file of the person against whom the complaint is made.

Everyone involved in an investigation must keep the names of those involved, the details of the complaint and the existence of the investigation confidential, subject to any legal disclosure obligations and to the need for the person against whom the complaint is made to know the details of the complaint.

If a person makes a complaint which is found to be capricious, malicious or knowingly false, any investigation will cease, and disciplinary or other appropriate action may be taken against the person making the complaint. No such action will be taken if the complaint is made in good faith as determined by the Human Resources Department.

First Pacific staff who observe or become aware of harassment or bullying should immediately advise their managers and the Human Resources Department for follow-up. Retaliation against or victimisation of a person making a complaint in good faith of harassment or bullying (or providing evidence in good faith of harassment or bullying) will not be tolerated. Nor will any person suffer any detriment as an employee (for example demotion) by reason of making such a complaint or providing such evidence.

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