



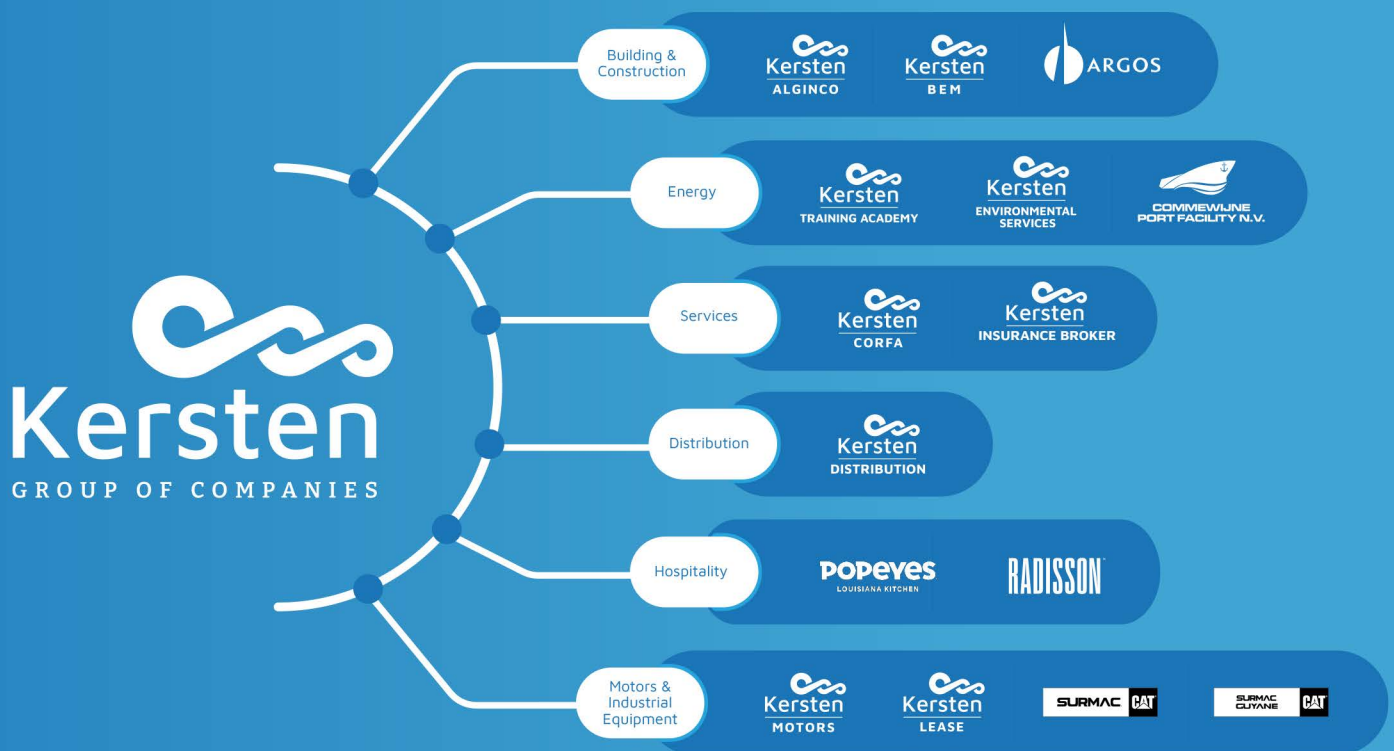
# **POLICY ON VIOLENCE HARASSMENT, SEXUAL HARASSMENT AND DISCRIMINATION**



# Kersten

GROUP OF COMPANIES

## Commercial Structure



6 divisions; 15 commercial activities

## Table of Contents

|          |  |          |
|----------|--|----------|
| <b>1</b> | <b>Introduction .....</b>                                | <b>4</b> |
| 1.1      | <i>Policy Purpose .....</i>                              | 4        |
| 1.2      | <i>Definitions .....</i>                                 | 4        |
| 1.3      | <i>Policy Statement .....</i>                            | 5        |
| 1.4      | <i>Scope and Compliance .....</i>                        | 6        |
| 1.5      | <i>Applicable Laws, Regulations, and Standards .....</i> | 6        |
| 1.6      | <i>Effective Date.....</i>                               | 6        |
| <b>2</b> | <b>Complaint Submission &amp; Procedure .....</b>        | <b>6</b> |
| 2.1      | <i>Submission .....</i>                                  | 6        |
| 2.2      | <i>Complaints Committee &amp; Composition.....</i>       | 6        |
| 2.3      | <i>Confidential Advisors .....</i>                       | 7        |
| 2.4      | <i>Complaint Filing .....</i>                            | 7        |
| 2.5      | <i>Right to Object .....</i>                             | 8        |
| 2.6      | <i>Preliminary Assessment .....</i>                      | 8        |
| 2.7      | <i>Investigation .....</i>                               | 8        |
| 2.8      | <i>Reporting and Measures .....</i>                      | 8        |
| 2.9      | <i>Records Keeping .....</i>                             | 9        |
| <b>3</b> | <b>Legal Remedies .....</b>                              | <b>9</b> |
| <b>4</b> | <b>Policy Review and Distribution .....</b>              | <b>9</b> |

## 1 Introduction

### 1.1 Policy Purpose

The Kersten Group is committed to providing a safe work environment for all its employees by preventing discrimination on any ground, violence, and harassment, including sexual harassment (“Prohibited conduct/ behavior”) at work. This Policy aims to proactively prevent and prohibit any form of violent, discriminatory, or harassing behavior within our workplace.

This Policy also outlines a comprehensive framework for the complaints handling process regarding Prohibited behavior within the Kersten Group. Complaints are managed by an appointed committee “Complaints Committee” composed of representatives from HR, Legal, and the Internal audit departments within the Kersten Group. This Policy includes procedures for complaint submission, investigation, measures, appeal options, and reporting.

### 1.2 Definitions

For the purpose of this Policy, the following definitions apply:

| Term                         | Definition  |
|------------------------------|---|
| Board of Directors (BoD)     | Board of Directors of C. Kersten en Co. N.V.  |
| Kersten Holding              | C. Kersten en Co. N.V.  |
| Kersten Group                | C. Kersten en Co. N.V. and its subsidiaries   |
| Operating Company (OpCo)     | A subsidiary in which Kersten Holding holds 50% or more of the shares (possibly, in combination with strategic partners).   |
| Complaint                    | A written notification submitted by a Complainant to the Complaints Committee regarding prohibited conduct.   |
| Complaints Committee         | The Committee, appointed by the BoD and authorized to investigate complaints regarding prohibited conduct within the workplace.   |
| Complainant                  | A person who claims to be subjected to, or a person who has witnessed alleged violence, discrimination, harassment, or sexual harassment and has submitted a complaint to the Complaints Committee. |
| Prohibited conduct/ behavior | Refers to workplace violence, harassment, sexual harassment, and discrimination.  |
| Defendant                    | The person against whom allegations of prohibited conduct under this Policy are made.   |
| Confidential advisors        | The persons appointed by the BoD to assist complainants throughout the complaint filing process and to provide support to complainants during the handling of the complaint.                        |
| Harassment                   | Any verbal, physical, or visual conduct designed to threaten, intimidate, humiliate, bully, or coerce an employee, customer, visitor, or any person working for or on behalf of the Kersten Group.  |

|                   |   |
|-------------------|---|
|                   |   |
| Sexual harassment | <p>Unsolicited or unwanted sexual acts, behaviors, or situations where a person seeks unsolicited or unwanted sexual advances toward another person, or unwelcome requests for sexual favors, or otherwise sexually approaches another person, and:</p> <ul style="list-style-type: none"> <li>• The person being harassed has reasonable grounds to believe that rejecting the advance or request, or expressing disapproval of the approach, will result in disadvantage regarding his/her employment or future employment; or</li> <li>• The person being harassed is disadvantaged regarding his/ her employment after rejecting the advance or request or expressing disapproval of the approach.</li> </ul> |
| Discrimination    | Any distinction (direct or indirect), exclusion, or preference based on race, gender, religion, skin color, ethnic origin, national origin, social origin, sexual orientation, gender identity, political beliefs and affiliations, disability, HIV status, and other chronic conditions, family responsibilities, pregnancy, age, or marital status.   |
| Violence          | Incidents of inappropriate behavior and practices- both isolated and repeated- where an employee is psychologically or physically harassed, threatened, or assaulted under circumstances directly related to the performance of work, including instances of bullying.  |
| Workplace         | Refers to any location or setting where employees carry out their job duties or where work-related activities occur, including but not limited to offices, company facilities, remote work locations, client sites, business travel, and company-sponsored events or gatherings. It encompasses both physical and virtual environments where individuals engage in work-related interactions or activities as part of their employment with the organization.   |

### 1.3 Policy Statement

The Kersten Group takes a zero-tolerance stance against any form of Prohibited behavior in the workplace, will treat all incidents seriously, and promptly investigate all allegations of violence, harassment, sexual harassment and discrimination. Any person found to have used violence, (sexually) harassed, or discriminated another person at the workplace will face disciplinary action, up to and including dismissal from employment. All complaints will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.



#### 1.4 Scope and Compliance

This Policy applies to all personnel of the Kersten Group, including, contractors, interns, persons in training and on-the-job trainees, volunteers, job seekers, temporary workers, as well as seasonal, part-time, and full-time employees.

All violence, harassment, sexual harassment, or discrimination is prohibited whether it takes place within the Kersten Group's premises or outside, including at social events, workshops, business trips, training sessions, or conferences organized or sponsored by the Kersten Group.

Complaints about prohibited behavior encompass all forms of conduct that violate our Code of Conduct, and/or applicable legislation in the territory where the Kersten Group operates.

#### 1.5 Applicable Laws, Regulations, and Standards

This Policy takes into account the Code of Conduct of the Kersten Group and the applicable laws of Suriname and other jurisdictions where the Kersten Group's businesses are domiciled and operated.

#### 1.6 Effective Date

This Policy takes effect on March 3, 2025 and will be reviewed every 2 (two) years, or alternatively, earlier should the need arise.

## 2 Complaint Submission & Procedure

### 2.1 Submission

Any individual who believes that he/she is a victim of violence, harassment, sexual harassment, discrimination or who witnesses such misconduct is encouraged to bring the misconduct forward to his/ her direct supervisor/manager or the HR Department. If in the opinion of the complainant this option has not provided a satisfactory solution, or if the complainant prefers not to pursue this option, the complainant may bring the misconduct forward to the Complaints Committee of the Kersten Group or via the Whistleblowing Policy & Procedure. In all cases, the matter will be treated confidential with discretion and diligence and in accordance with the applicable laws and the established policies and standards of the Kersten Group.

### 2.2 Complaints Committee & Composition

The Kersten Group has established a Complaints Committee to diligently investigate any complaint regarding prohibited behavior in the workplace. The Complaints Committee is authorized to summon all relevant stakeholders (the employer, the complainant, the defendant, and witnesses) to be heard regarding the complaint. Stakeholders are required to comply with the summon, are obligated to provide all relevant information for the assessment of the complaint and must fully cooperate with the investigation.

The Complaints Committee will diligently investigate the complaint, thoroughly examining all relevant information and conducting necessary interviews. The Committee ensures the confidentiality of complaints and treats each complaint with the utmost discretion. Confidentiality is maintained throughout the complaint handling process, ensuring that sensitive information is not disclosed to third parties without due (legal) cause. The confidentiality of the case persists even subsequent to its closure ensuring the utmost discretion and privacy for all involved stakeholders. The Committee is composed of individuals appointed from the Human Resources, Legal, and Internal Audit departments of the Kersten Group. Each member contributes distinct skills and perspectives, collectively ensuring a comprehensive, independent, and well-rounded approach to the complaints handling process.

## 2.3 Confidential Advisors

The Kersten Group has appointed confidential advisors to assist complainants throughout the complaint filing process and to provide support to complainants during the handling of the complaint. These advisors are available to provide any additional guidance needed for the well-being of the complainant. The role of the confidential advisors is strictly confidential and does not entail the actual conducting of the investigations or resolving complaints.

## 2.4 Complaint Filing

Any person who believes to have experienced or witnessed any form or act of prohibited conduct can, without fear of retaliation, report the incident as follows:

- a. The complaint must be submitted in writing to the Complaints Committee (via email: [Klachtencommissie@kersten.sr](mailto:Klachtencommissie@kersten.sr));
- b. The complaint should include all relevant facts and circumstances, clearly indicating the violated norms/ specific prohibited conduct;
- c. Complainant's details, including name and address, must be provided;
- d. The name(s) of the defendant (s);
- e. The names of witnesses and any physical and/or documentary proof in support of the allegation;
- f. Any other relevant information. Any referenced documentation must be submitted along with the complaint.

For the submission of the complaint, the complainant can use the form attached as an annex to this Policy. A complainant may, at his or her discretion, withdraw a complaint at any time during the complaint procedure. However, the Complaints Committee may, at its discretion, pursue the procedure.

If the complaint involves a member of the BoD or a member of the Complaints Committee, the complaint will be handled by the Supervisory Board of C. Kersten en Co. N.V. in accordance with the applicable law. In the aforementioned cases, the complaint must be submitted in writing to the chairperson of the Supervisory Board of C. Kersten en Co. N.V. (via email: [SBklachten@kersten.sr](mailto:SBklachten@kersten.sr)).

## 2.5 Right to Object

The complainant may, within three (3) working days after submitting the complaint, submit a written request to the BoD, with reasons provided, to object to a member of the Complaints Committee. The objection shall suspend the investigation. The BoD shall decide on the validity of the objection within five (5) working days upon receipt of the request. If the BoD honors the request, the objected member shall be temporarily replaced by a substitute member.

## 2.6 Preliminary Assessment

Upon receipt, the Complaints Committee registers the complaint and sends an acknowledgment of receipt to the complainant within five (5) working days. In case of incomplete or unclear complaints, the Complaints Committee may request the complainant to provide further details. Complaints not meeting the specified requirements may not be considered for further review.

## 2.7 Investigation

The Complaints Committee is responsible for ensuring a confidential, thorough, fair, and impartial investigation of the allegations in the complaint. The Committee will interview the complainant, the defendant(s), and relevant witnesses suggested by the complainant or defendant(s), as well as gather information, data, and supporting documents relevant to the complaint. The Committee shall have access to all relevant information, data, and documents needed to conduct a proper investigation. All staff (including the OpCo General Manager/Director) of the Kersten Group are required to cooperate with the Complaints Committee. The complainant will be given a reasonable opportunity to clarify his/ her complaint and to produce supporting evidence. On the other hand, the defendant will also be given a reasonable opportunity to understand the complaint and to respond by providing relevant evidence to defend himself.

## 2.8 Reporting and Measures

Following a comprehensive assessment, the Committee will provide the BoD with a detailed report within 30 (thirty) working days from the date of the complaint receipt. The report will encompass findings, recommendations, and any proposed actions to address the matter. The recommendation of the Committee is, in principle, binding. The report will be submitted to the BoD.

Measures are taken by the BoD based on the severity of the behavior, ranging from awareness training to disciplinary actions or termination of the working relationship. Should the situation warrant, disciplinary measures will be imposed in accordance with the procedures stipulated in Paragraphs 7 and 8 of the Code of Conduct of the Kersten Group and in accordance with terms of the applicable (employment) contract and legislation.



## 2.9 Records Keeping

Each phase of the complaints procedure is diligently recorded, ensuring the confidentiality of all parties involved. Annually, the Committee assesses the effectiveness of the complaints handling process and implements adjustments based on acquired insights.

## 3 Legal Remedies

The complainant may seek in accordance with the applicable law further legal remedies if he/she is not satisfied with the way the Complaints Committee has handled the complaint. The Complaints Committee will provide all reasonable assistance to the authorized authorities to investigate the complaint upon request.

## 4 Policy Review and Distribution

The Human Resources Department of Kersten Holding is responsible for communicating, maintaining, updating, and revising this Policy. In collaboration with the OpCo HR Managers awareness activities and information regarding this Policy will be provided to the stakeholders. If this Policy is updated or revised it should also be stated clearly which previous version, it replaces.



Kersten

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