



NON-DISCRIMINATION POLICY

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1. PURPOSE AND POLICY STATEMENT

QTerminals aims to ensure a work environment in which all individuals – Employees, partners, suppliers, customers, and any other Third Parties – are treated with respect and dignity. This ambition is reflected in QTerminals' Corporate Values – Safety, Integrity, and Teamwork – which are the foundation of QTerminals' culture and the leading principles for every action it takes.

Hence, QTerminals has zero tolerance for all kinds of discrimination. Within the company, QTerminals fosters diversity and commits to a workplace of non-discrimination regarding race, religion, sex, age, and other characteristics. Additionally, QTerminals strives to ensure the fair treatment of workers and working conditions in compliance with local regulations.

The Non-Discrimination Policy (hereinafter "Policy") contains QTerminals' commitment to non-discrimination and dictates the standards and principles of expected workplace actions and behavior regarding how QTerminals does business and how it engages with communities in its areas of operations.

QTerminals expects any Third Party that works with it or on its behalf to uphold the principles stated in this Policy and requires them to adopt similar policies within their own businesses.

The Non-Discrimination Policy is complementary to QTerminals' Code of Conduct and the Human Rights Policy and hence should be read together.

2. SCOPE OF APPLICATION

The Policy applies globally to all Employees of QTerminals, as outlined in the "Definitions" section of the Policy below. The Policy does not replace any national or international law. In case applicable laws in specific regions are stricter than the standards and principles outlined in this Policy, the stricter law or regulation shall take prevalence over this Policy. In case applicable laws in specific regions are more lenient than the standards and principles outlined in this Policy, the standards of this Policy apply.

QTerminals expects that any Third Party who works with it or on its behalf (including with no limitation business partners, suppliers, consultants, and other representatives) must adopt and follow the principles of the Policy, plus have a compatible non-discrimination policy of their own.

In addition, Third Parties must adopt and comply with the QTerminals Third Party Code of Conduct.

For more information, please refer to [Third Party Code of Conduct](#).

3. DEFINITIONS

Abuse means the cruel, violent, or unfair treatment of someone. Different types of abuse include:

- Physical abuse, which refers to the physical act of harming someone, e.g., through assaulting, hitting, slapping, pushing, or the misusing medication. It includes sexual abuse and financial abuse.
- Verbal abuse, also known as emotional abuse, refers to any statement or act (oral or written) to manipulate, intimidate, and/or maintain power over someone. It includes insults and humiliation.

Blackmailing describes an act of coercion using the threat of publishing either true or false, but often damaging, information about an individual unless a certain requirement is fulfilled.

Bullying refers to the use of power to seek and invoke pain on another person. It includes making threats, spreading rumours, attacking someone physically or verbally, and excluding someone from a group on purpose.

Coercion refers to the act or process of persuading an individual forcefully to do something against his/her will.

Discrimination is an unjust or prejudicial treatment of a person, or a particular group based on characteristics (e.g., nationality, religion, ethnicity, culture, etc.).

Employees means all QTerminals' employees (including contracted workers), officers, directors (including those assigned to minority owned and non-controlled entities of QTerminals).

Ethics Review Panel (ERP) means a multidisciplinary body within QTerminals committed to reviewing all reported alleged unethical matters, misconduct, and wrongdoings in a timely manner and deciding on the respective disciplinary action. ERP members are selected on the case-by-case basis by the Group Legal and Compliance Director, depending on the nature and criticality of the alleged misconduct and/or wrongdoing.

Harassment is any kind of unwanted behaviour that creates an offensive, hostile, or intimidating working environment, such as offensive jokes, insults, intimidation, shouting, bullying, mockery, unwanted physical contact, violence, threats, etc.

Human Rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

Line Manager is a person with direct managerial responsibility for a particular Employee.

Name-Calling is the act of using offensive names to belittle or humiliate an individual, e.g., in a discussion or argumentation.

Protected Characteristics include age, disability, gender reassignment, sex, sexual orientation, race, religion or belief.

Public Shaming refers to the punishment of individuals in order to dishonour or disgrace them in a public place.

QTerminals means QTerminals W.L.L. and its controlled subsidiaries, affiliates, and joint ventures.


Third Party is any business partner, supplier, service provider, consultant and other representatives with whom QTerminals has a business relationship.

Violence refers to the act of using physical force to injure, abuse, damage, or destroy.

4. COMMITMENTS AND GUIDELINES

Our Non-Discrimination Commitments

As a global organisation that employs and impacts many organisations and individuals across the world, QTerminals is aware of its influence and responsibility to people and the environment and hence commits to creating a safe, inclusive, and respectable workplace in accordance with international and relevant local regulations.



Non-discrimination is an integral part of human rights and refers to the equal treatment of all humans regardless of their ethnicity, race, sex, age, language, religion or other status. QTerminals has zero-tolerance for any kind of discrimination within the workplace. This includes all forms of discrimination, including that which occurs virtually (e.g., through emails).

For more information on human rights, please refer to [QTerminals Human Rights Policy](#).

4.1 Non-Discrimination and Diversity

QTerminals' corporate culture values the individuality of each Employee and promotes equal opportunities, irrespective of race, skin colour, language, age, disability, ethnic-cultural origin, gender, religion, or any other reason. QTerminals aims to further contribute to this by strengthening an inclusive culture built on the principles of equality and diversity.

Discrimination includes, but is not limited to the following behaviours:

- Making inappropriate jokes about a colleague's ethnicity
- Not hiring someone because of their protected characteristics, such as race, skin colour, gender, or religion
- Hindering someone's career development because of their protected characteristics, such as age or gender.

Anti-Harassment

QTerminals promotes a respectful work environment and hence does not tolerate any kind of disrespect or inappropriate behaviour. QTerminals has no tolerance for any kind of harassment – verbal, physical, and sexual – at the workplace and in any work-related circumstance outside the workplace.

Harassment includes, but is not limited to the following behaviours:

- Making derogatory or condescending comments about the heritage, religion, or beliefs of an individual
- Making unwanted sexual advances and improper or unwanted touching towards a colleague
- Practicing physical threats or assaults
- Spreading malicious rumours to discredit someone
- Sending abusive messages, pictures, or videos virtually or creating and publishing content about an individual that depicts the person in negative ways.

Anti-Bullying

The effect of bullying can be long-lasting and can impact a person's mental and physical health. Hence, preventing this from occurring is a core component of ensuring a respectful workplace. QTerminals stands strongly against bullying in and outside the workplace.

Bullying includes, but is not limited to the following behaviours:

- Making harmful expressions directed at individuals, such as derogatory remarks and verbal and non-verbal attacks
- Practicing unwanted physical contact or intimidating gestures
- Practicing unwarranted exclusion or isolation of an individual, e.g., through speaking a different language that the individual does not speak
- Sabotaging or threatening to sabotage or destroy the work of colleagues

Anti-Violence

QTerminals is committed to providing a healthy and safe work environment. Hence, QTerminals has no tolerance for any kind of behaviour that risks the health and safety of QTerminals' Employees and any Third Party it engages with. QTerminals strictly prohibits making threats or engaging in violent activities.

Violence includes, but is not limited to the following behaviours:

- Injuring an individual physically
- Acting physically, verbally, or in written form against an individual, which causes the individual reasonably to fear for their safety or the safety of others
- Damaging someone else's property intentionally

Anti-Coercion

All work done by QTerminals Employees, or its Third Parties must be done out of free will. QTerminals condemns any type of coercion.

Coercion includes, but is not limited to the following behaviour:

- Using threats of dismissal to persuade an employee to perform activities not implied by their duties
- Blackmailing other employees into certain activities or decisions

Anti-Public Shaming

QTerminals continuously strives for a workplace in which all Employees and business partners feel respected and heard. QTerminals does not support any kind of public shaming, within the workplace or any place related to work.

Public Shaming includes, but is not limited to the following behaviours:

- Making fun of a colleague in response to their ideas, beliefs, or opinions shared in a meeting
- Reprimanding someone publicly
- Practicing name-calling against an individual

Fair Working Conditions and Equal Opportunities

QTerminals aims to provide fair working conditions to its Employees. This implies fair conditions for working hours, leave and rest periods. Each jurisdiction may have different working requirements, and therefore QTerminals ensures that all Employees are treated fairly in line with local regulations.

QTerminals also commits to the promotion of equal employment opportunities and fair treatment within employment practices, including the recruitment process, during promotion discussions, and termination conditions, while also complying with local laws and regulations.

Examples of unfair conditions and unequal opportunities include, but are not limited to the following behaviours:

- Denying an individual's contractual right to attend a training without a valid reason
- Promoting someone due to their, for example, gender, instead of their performance

4.2 Guidelines

QTerminals requires the support of its Employees to be able to identify and mitigate any kind of violation against non-discrimination. This includes the commitment of all Employees to strictly comply with this Policy and directly report any incidents violating this Policy either self-experienced or observed. Precisely, if a QTerminals Employee becomes aware of a non-discrimination standard not being upheld by any member, group or Third Party affiliated with QTerminals, they must report it immediately. They may report it directly through Line Manager, the Whistleblower, or opt for alternative methods like QTerminals Ethics Line.

For more information on how to report violations, please refer to chapter: Maintaining standards that promote a respectable work environment are not only legal requirements for businesses to follow but are also moral and ethical duties that humans should adhere to. Failure to comply with them is against the law and exposes the company to significant consequences. Therefore, all Employees are responsible for reading, understanding, acknowledging, and adhering to all aspects of this Policy and any supplementary procedures issued by QTerminals, including:

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- Complying with any applicable standards set in this Policy within their daily business conduct
- Identifying breaches of these standards and reporting them immediately
- Collaborating with Line Managers and relevant departments to provide additional information, if needed, to prevent or act upon any violations of the Policy
- Being vigilant for any suspicious activity that can be a potential breach of this Policy, both at QTerminals, our suppliers, partners, and other Third Parties working with us
- Prioritising and completing any mandatory training related to this topic in a timely manner
- Contacting your Line Manager and, if required, a Compliance Officer/Representative to clarify questions, request information, or express concerns relating to this topic


Line Managers, along with the relevant guidance of Compliance and HR departments, shall ensure that any Non-Discrimination concerns are reported, addressed, and resolved.

Management of QTerminals is responsible for ensuring that the components of this Policy are respected. Each managing senior executive of QTerminals at port or terminal level must ensure that the business unit they are responsible for is and will remain fully compliant with this Policy. They must also promote awareness and understanding of this Policy and ensure allocation of adequate resources to effectively implement all standards mentioned in the Policy. Specifically, the Compliance team must ensure that the required processes are in place that enable adherence to this Policy.

6. SPEAK UP

5. RESPONSIBILITIES

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6. SPEAK UP

QTerminals promotes an environment of integrity and transparency under which its Employees are encouraged to report any violation or suspected violation of this Policy within QTerminals or at any of the Third Parties, either by informing their Line Manager, their HR department, their Compliance Officer/Representative or alternatively through the QTerminals Ethics Line, which is available on QTerminals intranet, QTerminals website and as a dedicated phone line.

Additionally, any retaliation against anyone who notices and reports a known or suspected violation of the Policy is strictly prohibited. Anyone proven to have retaliated against a person who has reported a breach in good faith will be subject to disciplinary action. However, any false or malicious allegations may also lead to appropriate disciplinary and legal action, up to and including termination of employment.

[For more information on the whistleblowing process, please refer to QTerminals Whistleblower Procedure.](#)

7. DISCIPLINARY ACTION

At QTerminals, all Employees are expected to abide by this Policy. Any violation thereof may result in disciplinary action, termination of employment or legal proceedings.

Additionally, all business relationships will be terminated with immediate effect if found that the Third Party has violated the standards QTerminals has documented within this Policy. There is zero tolerance for any breaches regardless of the circumstance.

In case the complaints for wrongdoings warrant an investigation, these will be conducted until completion. The results and proposed corrective actions of the investigations will be reviewed by the Ethics Review Panel (ERP), where corrective actions will be determined based on the facts and circumstances of the breach of conduct and results of the investigation.

For more information on the process of investigation of alleged misconduct and violations of the Code of Conduct or this Policy, please refer to [QTerminals Whistleblower Procedure](#).

8. REVIEW PROCESS

Compliance team will periodically evaluate the adequacy and effectiveness of this Policy. Depending upon the results of such reviews, amendments might be proposed and introduced.

Approved By:



Group CEO

Neville Bissett