



# Tropical Canning (Thailand) Public Company Limited

## Bullying & Harassment Policy

### Purpose and Scope

The purpose of this policy is to establish clear guidelines and procedures for addressing employee misconduct. Tropical Canning (Thailand) Public Company Limited (Tropical Canning) aims to ensure fair and consistent treatment of all employees while maintaining a productive and respectful work environment.

Tropical Canning is committed to providing a work environment free from bullying and harassment. The purpose of this policy is to clearly outline our approach to the prevention of bullying and harassment within the workplace.

### Minimum Guidelines

- a. It is the responsibility of all employees to provide a working environment free from bullying and harassment.
- b. It is also the responsibility of all employees to report any signs of this unwanted behaviour to the Corporate Responsibility Team, including the Human Resources Department.
- c. Management **MUST** take all alleged complaints seriously and act on them in accordance with the outlined procedure, ensuring that confidentiality is maintained at all times.
- d. Any employee that is privy to alleged complaints **MUST** ensure confidentiality at all times and that company procedures are adhered to.
- e. Any employee who is determined, after an investigation, to have engaged in harassment in violation of this policy will be subject to appropriate sanctions up to and including termination.
- f. All managers and employees, both individually and collectively, are responsible for the understanding and implementation of the company's workplace bullying policy.

### Definition of Harassment

Harassment covers a wide range of behaviours of an offensive nature. It is commonly understood as behaviour intended to disturb or upset and it is characteristically repetitive.

### Sexual Harassment

There is no single, universally-accepted definition of sexual harassment. However, the definition adopted should be consistent with the legal definition to avoid any confusion. The most important element to emphasise in any definition is that sexual harassment is unwelcome behaviour of a sexual nature. For example, sexual harassment can be defined in the following way:

"Sexual harassment is any unwanted, unwelcome or uninvited behaviour of a sexual nature which makes a person feel humiliated, intimidated or offended. Sexual harassment can take many different forms and may include physical contact, verbal comments, jokes, propositions, the display of offensive material or other behaviour which creates a sexually hostile working environment."

Examples of sexual harassment in the working environment:

- Uninvited touching
- Uninvited kisses or embraces
- Smutty jokes or comments
- Making promises or threats in return for sexual favours
- Displays of sexually graphic material including posters, pinups, cartoons, graffiti or messages left on notice boards, desks or common areas
- Repeated invitations to go out after prior refusal



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- Sexual gestures
- Sex-based insults, taunts, teasing or name-calling
- Staring or leering at a person or at parts of their body
- Unwelcome physical contact such as massaging a person without invitation or deliberately brushing up against them
- Touching or fiddling with a person's clothing e.g. lifting up skirts or shirts or putting hands in a person's pocket
- Requests for sex
- Sexually-explicit conversations
- Persistent questions or insinuations about a person's private life

### Definition of Bullying

The legal definition of workplace bullying is:

"Repeated unreasonable behaviour directed towards a worker or a group of workers that creates a risk of health and safety"

Bullies usually utilise power attributed to their status, skills or position in the workplace and both men and women can be the targets and/or the perpetrators. Workplace bullying can occur between a worker and a manager or supervisor, or between co-workers.

Bullying behaviour can range from very obvious verbal or physical assault to very subtle psychological abuse. This behaviour may include:

- Physical or verbal abuse
- Yelling, screaming or obscene language
- Excluding or isolating employees
- Psychological harassment
- Intimidation
- Assigning meaningless tasks or tasks unrelated to the job
- Giving employees impossible jobs
- Deliberately changed work rosters to inconvenience particular employees, and/or
- Undermining work performance by deliberately withholding information vital for effective work performance.

Workplace bullying by any employee is deemed to be unacceptable behaviour and will be subject to disciplinary action.

### What is NOT considered to be Bullying?

Workplace bullying must not be confused with legitimate comment and advice (including relevant negative comment or feedback) from managers and supervisors on the work performance or work-related behaviour of an individual or group.

The process of providing feedback to employees during a formal performance appraisal, or counselling employees regarding their work performance, will not always be free of stress. Managers should manage these processes with sensitivity, but they should not avoid their responsibility to provide full and frank feedback to employees.



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Unsubstantiated allegations of workplace bullying that are designed to put pressure on an employee are also considered to be a form of workplace bullying and, as such, are considered to be unacceptable behaviour.

Tropical Canning encourages workers to speak up and not ignore bullying and harassment thinking it will go away. Silence gives the impression that bullying and harassment are acceptable.

A handwritten signature in blue ink, appearing to be 'KAMPOL WATCHARANIMIT', written over a horizontal line.

(KAMPOL WATCHARANIMIT)  
MANAGING DIRECTOR

18th August 2023