

Socfin Group - Policy on sexual harassment and violence

1. Policy statement

We are committed to a safe, respectful, and inclusive environment, free from all forms of abuse and harassment. Our **zero-tolerance** stance applies to any sexual harassment or violence across our operations. All reports will be taken seriously, treated confidentially, and investigated promptly. Retaliation against those reporting in good faith will not be tolerated.

Sexual harassment often stems from power imbalances, especially in hierarchical relationships. Any individual accused of such conduct will be investigated, and appropriate action will follow if misconduct is confirmed.

2. Scope

This policy applies to:

- All Group operations we own, manage or in which we invest, regardless of the level of shareholding, including subsidiaries, offices, factories, plantations, and compounds.
- All individuals: employees, contractors, casual workers, clients, customers, visitors.
- All settings: workplaces, off-site events, and work-related travel.
- All incidents regardless of gender, role, or personal attributes.

3. Definitions

Sexual harassment, as defined by the ILO (International Labour Organization), is any **unwanted sexual behavior** that creates a hostile, intimidating, or offensive environment. It includes:

Physical conduct: unwanted touching, assault, or coercion tied or not to job benefits.

Verbal conduct: sexual jokes, comments, advances, or threats.

Non-verbal conduct: explicit messages, inappropriate gestures, stalking, or sharing private images without consent.

Anyone, regardless of sex or gender, can be a victim or perpetrator.

4. Complaint reporting mechanisms

Victims or witnesses are encouraged to report incidents through local or corporate channels. When possible, inform the alleged harasser that the conduct is unwanted and unwelcome.

Local reporting options include:

- Gender Committee members,
- Local Compliance Officers or Management,
- Internal/external grievance mechanisms,
- Subsidiary-specific sexual harassment procedures,
- Local whistleblowing hotline.

Corporate-level options include:

- Group Compliance Officer,
- Group whistleblowing service (online or by phone).

Any complaint can be made anonymously. Socfin is committed to regularly reporting on effectiveness.

Socfin encourages the use of its grievance mechanism, however, respects the right of anyone subject to sexual harassment to pursue matters independently of this policy through the legal framework applicable to their situation.

5. Policy implementation

This policy will be shared widely. We will ensure strong alignment between this policy and policies within subsidiaries.

Implementation will be driven by a **timebound action plan**, overseen by a Group-level focal point. Progress will be regularly communicated.

6. Gender Committees

Gender Committees play a key role in raising awareness and monitoring. They also offer confidential support to victims. Subsidiary General Managers will ensure these committees receive the necessary resources and training to manage cases effectively.

7. Investigation and penalties

A formal process will be in place to handle reports discreetly. It will outline:

- Reporting and investigation steps,
- Responsibilities of involved parties,
- Disciplinary actions,
- Law enforcement involvement, if necessary.

8. Sanctions and disciplinary measures

Confirmed offenders will face disciplinary actions proportionate to the misconduct. Severe cases, especially involving violence, may be reported to law enforcement with the victim's consent.

9. Confidentiality and non-retaliation

All complaints will be treated confidentially, with sensitivity and respecting anonymity where requested. Those who report or assist in investigations in good faith are protected from retaliation. Any breaches of this clause will result in disciplinary action.

10. Monitoring and evaluation

The policy's use and effectiveness will be monitored via anonymous data collection and quarterly management reports. Milestones and KPIs to track implementation of this policy will be made public.

Additionally, worker and community surveys will assess confidence in reporting systems, guiding any needed policy and implementation adjustments.

Approved by the Socfin Board of Directors on the 3rd of July 2025.



Philippe Fabri



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