

Equal Employment Opportunity and Anti- Discrimination, Harassment, Bullying and Victimisation Policy

Purpose

RightShip is committed to promoting equal opportunities in employment and the avoidance of discrimination at work. You and any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, or any other characteristics protected by applicable law (**Protected Characteristics**).

Policy statement

This policy sets out our approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, performance, and termination of employment.

Human Resources is responsible for this policy and any necessary training on equal opportunities.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

Definitions

The definitions relevant to this policy are set out in Appendix A: Definitions.

Scope

This Policy applies to the conduct of all RightShip employees and contractors across all our offices, while they are at work and during their interactions with job applicants, colleagues, visitors and other members of the public.

The terms of this Policy do not form part of an employee's contract of employment and the policy may be varied, replaced or terminated at any time without notice at RightShip's discretion.

Equal employment opportunity

RightShip aims to make decisions on who it employs and engages based on suitability, experience and merit. We are committed to avoiding unlawful discrimination in the hiring, promotion and engagement of our workforce.

All employees, contractors and job applicants will be assessed according to their skills, qualifications, abilities, prior work performance, aptitude and general ability to perform the inherent requirements of the position in question.

Discrimination

What is discrimination?

Depending on where you are situated, there may be anti-discrimination legislation providing that it is an offence to discriminate against someone or harass someone, including on the basis of certain attributes including sex, sexual orientation, race, age, marital status, pregnancy or potential pregnancy, colour, religion, political opinion, membership in a trade union or disability (or any other characteristic protected under applicable law).

For the full list of attributes protected under anti-discrimination legislation in Australia please refer to Appendix B.

For the full list of protected characteristics under anti-discrimination legislation in the UK please refer to Appendix C.

For the full list of protected characteristics under anti-discrimination legislation in the USA please refer to Appendix D.

For the full list of attributes protected under anti-discrimination legislation in Malta please refer to Appendix E

The following forms of discrimination are prohibited under this policy and are unlawful:

- (a) **Direct discrimination:** treating someone less favourably because of a Protected Characteristic.
- (b) **Indirect discrimination:** a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic / Attribute more than others, and is not justified.
- (c) **Bullying and harassment:** this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them.
- (d) **Victimisation:** retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.

- (e) **Disability discrimination:** this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability to the extent required by applicable law.

RightShip is committed to eliminating all forms of discrimination, harassment and victimisation from its workplaces. This includes actions taken against people who have a Protected Characteristic themselves, as well as those who are associated with a person who has a Protected Characteristic.

RightShip may be held vicariously liable for the unlawful conduct of its employees and for any unlawful discrimination or harassment of its employees in breach of equal opportunity and anti-discrimination legislation in the jurisdictions in which it operates. Any party (including RightShip) may also have accessory liability for unlawful conduct where they induce, permit or otherwise authorise unlawful conduct.

Examples of workplace bullying

The following types of behaviour, where repeated or occurring as part of a pattern of behaviour, may amount to bullying:

- verbal abuse, screaming, insults, swearing at a person or name calling or other derogatory comments;
- physical contact or assault;
- deliberately excluding or isolating an individual or a group from workplace activities;
- unconstructive criticism and/or "nit-picking";
- intimidation or threats;
- assigning meaningless tasks unrelated to a job or which are unreasonably below a person's skills, experience and qualifications to perform;
- unreasonably overloading a person with work and allowing insufficient time for completion;
- deliberately changing work rosters to inconvenience particular people;
- using a position of dominance to unreasonably pressure an individual;
- spreading gossip or rumours;
- practical jokes; and
- deliberately withholding information that a person needs to adequately undertake their role

This list is not exhaustive. Other types of behaviour may also amount to bullying.

Responsibilities

Breach of applicable anti-discrimination, harassment, bullying or victimisation legislation may lead to legal action being taken against RightShip, the employee or both.

To minimise this risk and to ensure a healthy and safe working environment, employees have a number of responsibilities under this Policy.

Managers and supervisors

Managers and supervisors must:

- review and ensure that they understand the types of unacceptable workplace behaviours set out in this Policy;
- monitor the working environment to ensure that acceptable standards of conduct are observed at all times;
- behave as a role model including by complying with this Policy at all times;
- educate and train their teams on this Policy;
- ensure that in accordance with the principles of equal employment opportunity, all opportunities within RightShip are based on merit;
- ensure their team's working environment is free of offensive, sexual, racist or other forms of stereotyping material, posters, screensavers and internet/email communication; and
- treat complaints seriously and take action on allegations or evidence of breaches of this policy.

All employees

All employees must comply with this Policy. As part of this obligation, employees must:

- treat fellow employees and contractors with courtesy and respect;
- not engage in any of the unlawful or unacceptable conduct outlined in this Policy (Prohibited Conduct);
- assist us in identifying and resolving any Prohibited Conduct;
- where Prohibited Conduct is identified or witnessed, speak with the perpetrator and make an objection to their conduct (if appropriate and if the employee is comfortable doing so) or notify their manager;
- not knowingly make a vexatious or false complaint that another person has engaged in Prohibited Conduct;
- support and encourage any employee who is subjected to Prohibited Conduct to notify management;

- keep confidential any incident of Prohibited Conduct (excluding reporting the incident to management) and any related complaints;
- assist and cooperate in investigations where requested by RightShip and maintain the confidentiality of any such investigation or their participation in any such process if they provide information during an investigation of a complaint.

Consequences of non-compliance

Any employee or contractor found to be in breach of this policy may be subject to disciplinary action, up to and including termination of their employment or the ending of their engagement or relationship with RightShip.

Depending on the seriousness of the breach, RightShip may also involve the police or relevant regulator or authority.

Dispute resolution policy

In the event that an employee wishes to make a grievance or complaint regarding behaviour or conduct of a type referred to in this Policy or otherwise, they should do so in accordance with RightShip's Dispute Resolution Policy.

References

RightShip documents

- Dispute Resolution Policy
- Workplace Health and Safety Policy

Policy ownership and review

This Policy is owned by the Chief Executive Officer.

This Policy requires the annual approval of the Chief Executive Officer.

Procedural Version Control

No.	Date approved	Date effective	Section amended	Authorised by
1	May 2020	May 2020	Initial release	CEO
2	February 2023	February 2023	Country specific Appendices attached	CEO

Appendix A: Definitions

Term	Definition
At Work	<p>Includes any time at which an employee, contractor or other person providing services to RightShip is:</p> <ul style="list-style-type: none">• carrying out, or acting in the course of, their duties (whether during or outside normal working hours);• attending a work function (even if outside normal business hours) such as team dinners, Christmas parties or client functions or any other function that RightShip has paid or will pay for;• travelling for work including overnight stays in accommodation for work related trips;• representing RightShip, for example, at a conference (including after hours), or entertaining clients on a formal or informal basis;• engaging in any activity where there is a relevant connection to the workplace (e.g. posting a message about RightShip or a customer or employee of RightShip on a social networking site such as Facebook or Twitter); or• otherwise acting within the course of their employment (employees) or within the scope of their engagement (contractors).
Direct Discrimination	<p>Direct discrimination occurs where a person treats or proposes to treat another person with an attribute listed in Appendices less favourably because of that attribute.</p> <p>Examples include the following situations:</p> <ul style="list-style-type: none">• an employer declines to offer a job to a candidate because the candidate has a physical disability, even though that disability has no impact on the candidate's ability to do the job;• an employer refuses to employ a woman because she is pregnant; or• an employer refuses to promote an employee because he identifies as LGBTIQ.

Indirect Discrimination	<p>Indirect discrimination occurs when a person imposes, or proposes to impose, a requirement, condition or practice that has, or is likely to have, the effect of disadvantaging persons with an attribute listed in the table above, and that requirement, condition or practice is not reasonable.</p> <p>Examples include the following situations:</p> <ul style="list-style-type: none">• a manager decides to give a promotion based on the longest period of service. While the decision may treat all employees the same way (i.e. by using their length of service to determine suitability for a promotion), it may discriminate against younger employees on the basis that younger employees are disadvantaged because of their age. It is unlikely to be reasonable if length of service is irrelevant to performing the job; and• an advertisement for a cleaning job requires an applicant to speak and read English fluently. This may disadvantage a person on the basis of their race and the requirement may not be reasonable if speaking and reading English fluently is not necessary to perform the job.
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Appendix B: Protected Attributes (Australia)

Sex	Physical features (Victoria, Australian Capital Territory)
Marital or relationship status	Carers' responsibilities (Victoria, New South Wales, South Australia)
Family responsibilities (including parental status)	Pregnancy (including potential pregnancy)
Breastfeeding	Age
HIV/AIDS (New South Wales, Australia Capital Territory)	Compulsory retirement (New South Wales, South Australia)
Mental, physical, intellectual or psychiatric disability/ impairment (including imputed disability/ impairment)	Irrelevant criminal record (Tasmania, Northern Territory, Australian Capital Territory)
Sexual orientation e.g. heterosexuality/ homosexuality Gender identity	Political beliefs/activities
Transgender and intersex status	Industrial, trade union or employer association activity (Western Australia, Tasmania, Queensland, Northern Territory, Australian Capital Territory)
Descent or national or ethnic origin	Irrelevant medical record (Tasmania, Northern Territory)
Race	Religion, religious beliefs or activity (Victoria, Western Australia, Tasmania, Queensland, Northern Territory, Australian Capital Territory)
Colour	Immigration status (Australian Capital Territory)

Appendix C: Protected Characteristics (UK)

Age
Disability
Gender Reassignment
Marriage and civil partnership
Pregnancy and maternity
Race
Religion or belief
Sex
Sexual orientation

Appendix D: Protected Attributes (USA & Texas)

Age (40 or older)
Color
Disability (including association with a disabled person)
Genetic Information (including family history)
National Origin or Citizenship
Participation In A General Public Evacuation Ordered Under An Emergency Evacuation Order
Race
Religion
Sex (including pregnancy, sexual orientation, and gender identity)
Workers Compensation Claim History

Appendix E: Protected Attributes (MALTA)

As outlined in the Employment and Industrial Relations Act any other applicable legislation.