Sexual Harassment Policy

Secure Risk Management Limited regards sexual harassment as a type of unacceptable misconduct that interferes with a proper employment relationship. Employees have a right to expect that their workplace and working environment will be free of any and all discrimination or conduct that is harassing, disruptive or coercive. Sexual harassment is strictly prohibited and will result in discipline, with the sanctions ranging up to and including termination.

1. Sexual Harassment Definition

Sexual harassment includes non-consensual verbal, physical, or visual sexually oriented conduct or materials, requests for sexual favors, or sexual advances. This includes anything that is objectionable or offensive to the person exposed to it, and includes, but is not limited to, sexual epithets, suggestive or derogatory slurs, gestures or comments, and offensive drawings, pictures, cartoons or posters.

Our policy is based on the legislative definition of sexual harassment. It includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature that occur under the following conditions:

- When conduct of this nature constitutes either an explicit or implicit condition or term of employment (such as when it impacts promotion, training, timekeeping or overtime assignments)
- When submission to or rejection of the conduct is utilized as a factor in making employment decisions (such as for hiring, promotion, or termination)
- When the conduct interferes with an individual's work performance or results in a hostile, intimidating, or offensive work environment

Sexual harassment may also involve employee conduct that interferes unreasonably with another employee's work performance through the creation of a hostile, intimidating, or offensive workplace environment. Sexual harassment includes any behavior by employees aimed at other employees including, but not limited to, explicit or subtle pressure for sexual activity, touching or language of an inappropriate nature, , asking for or demanding sexual favors, or physical assault.

2. What is excluded from the definition of sexual harassment?

Sexual harassment does not include socially acceptable occasional remarks or compliments or common friendly terms of greeting. It only encompasses unwelcome behavior, and that which interferes with work effectiveness by decreasing morale or being personally offensive.

3. Non-Employee Harassment

Our company tries to protect all employees from harassment by customers, vendors and other non-employees that they come into contact with.

4. Procedure for Complaints

Employees who believe that they have been subject to sexual harassment should report it right away to the company Director or any other supervisory personnel. Employees are encouraged to make such reports in writing, to create a record, but verbal complaints are also accepted and welcome. Any such complaints are taken seriously and are promptly and fully investigated. The confidentiality of the person involved and witnesses shall be protected from unneeded disclosure insofar as it is possible to do so. The individuals have a right to be informed of the results of the investigation.

Under usual circumstances, the individual will be contacted by the company within five days of their complaint and informed as to what steps are being taken in response. When a direct supervisor or other superior is the perpetrator of the sexual harassment, their conduct should be reported to their supervisor or the company Director.

5. Discipline

If an employee, including a supervisor, is determined to have harassed an applicant for employment or current employee, disciplinary sanctions will be imposed which may include reprimands, suspension, or termination.

Legal responsibility may also be imposed.

6. Managerial Responsibility

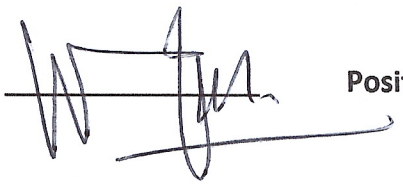
Managers and supervisors are charged with the responsibility of carrying out this policy with their area supervised. Sexual harassment is a violation of this policy and is also unlawful. The company acknowledges its responsibility to prevent, stop, and remedy workplace sexual harassment, to promptly investigate any complaints, and to immediately take corrective action to remedy the problem.

7. Retaliation Prohibited

The company is opposed to and will not tolerate any retaliation against an employee who themselves complains about sexual harassment or who serves as a witness in an investigation of a sexual harassment complaint.

8. Amendment of Written Policy

This policy may be amended in writing from time to time, with any new version appearing in the employee handbook. We encourage employees to review this document now and whenever it is amended.

Signed:  **Position:** Managing Director **Date:** 1st December 2025