

	Harassment and Retaliation Policy	Rev. No.	1
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PURPOSE

Maridive commits to create a working environment free of hostility, offensive behavior and intimidation. We commit to provide employees a means of reporting harassment. Everyone at every level of the Company should be able to raise any compliance concerns without any fear.

SCOPE

The Company strictly prohibits any conduct which constitutes harassment and will investigate and discipline any employee engaging in such prohibited conduct and does not tolerate retaliation against anyone for raising a concern in good faith. This policy applies to all Maridive Group employees.

DEFINITIONS

Harassment is defined generally as an unpleasant or hostile situation created by unwelcome verbal or physical conduct and any other verbal, visual or physical conduct of a harassing nature.

Harassment exists when an employee exercises, or threatens to exercise, the authority and power of their position to control, influence, direct or affect the job, duties, earnings or career of another employee or prospective employee. It also exists when the conduct in question would tend to create an intimidating work environment or to interfere with an employee's work. Harassment may take many forms including but not limited to:

- verbal harassment or abuse;
- indirect pressure or requests for sexual activity;
- physical harassment or abuse, e.g., pushing, fighting, etc.;
- requesting or demanding any behavior accompanied by implied or explicit threats concerning an individual's employment status;
- requesting or demanding any behavior accompanied by implied or explicit promises of preferential treatment with regard to an individual's employment status.

Retaliation is defined as an adverse action taken against an employee who reports or raises (or who is presumed to have reported or raised) a concern in good faith, supports (or is presumed to have supported) another employee's concern, or participates (or is presumed to have participated) in an audit or investigation of actual or suspected misconduct, violation of our Code of Business Conduct, policies, or the law.

Retaliation can include threats, intimidation and humiliation. We require directors, managers, supervisors, and any other Maridive leaders and all employees to uphold our commitment, by never retaliating themselves or allowing others to retaliate.

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RESPONSIBILITY

Each manager or supervisor of the Company is accountable, as part of their responsibility, for directing the work of others and taking action to prevent the occurrence of harassment in their area. It is also their responsibility to immediately report any complaint to the Human Resources Department or the Legal Department.

Each employee must be secure in confronting issues without fear of retaliation.

ACTION

Any employee who feels they have been subjected to harassment or retaliation by anyone, including supervisors, co-workers or visitors must bring the problem to the attention of their supervisor, Human Resources Manager or Legal Department. If the employee does not feel comfortable talking to their supervisor, then they should contact one of the other department managers.

Allegations of harassment or retaliation will be promptly and thoroughly investigated and appropriate corrective or disciplinary action, up to and including termination, will be taken to remedy violation of this policy.

The Company will retain, in confidence, information and documentation of all allegations and investigations, except when disclosure is necessary in connection with legal or other administrative proceedings.



**Chief Executive Officer
Mohamed El Gamal**