



# EXTERNAL HARASSMENT POLICY AND PROCEDURE

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## **1. Purpose**

The purpose of this policy is to ensure an environment free of harassment at Red Rocket Holding and in the Red Rocket Group (hereinafter “**Red Rocket**”). In all of Red Rocket’s dealings, we undertake to promote safety and equality.

This policy provides our procedures to deal with harassment, but most importantly this policy looks to prevent harassment from occurring in the first place. What we want is an environment where individuals respect their colleagues, our customers and our suppliers / service providers’ integrity, dignity, privacy and right to equality.

## **2. Policy Values**

- Harassment, including acts of violence, will not be tolerated by Red Rocket;
- Harassment on a prohibited ground (see point 4 below) is a form of unfair discrimination which violates the rights of the victim;
- Grievances about harassment will be investigated and handled confidentially;
- Victims of harassment have the right to follow the procedures set out in this policy and appropriate action will be taken by Red Rocket; and
- It is a disciplinary offence to victimize or retaliate against an individual who, in good faith, submits a grievance about harassment.

## **3. Application**

The perpetrators and victims of harassment can include executives, line managers, supervisors, employees, job applicants and job seekers, clients or customers, suppliers, service providers, contractors, volunteers, persons in training including interns, or anyone else who deals with Red Rocket or is impacted by Red Rocket projects.

This policy is intended to be used by any person who has dealings with Red Rocket or an employee or contractor of Red Rocket, and believes they have suffered an act of harassment.



#### **4. Definition of Harassment**

The legal definition of "Harassment" is:

- Unwanted conducted which impairs dignity;
- Which creates a hostile or intimidating environment for one or more individuals or is calculated to, or has the effect of, inducing submission by actual or threatened adverse consequences; and
- Is related to one or more grounds in respect of which discrimination is prohibited.

The protected grounds are: race, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age, disability, religion, HIV status, conscience, belief, political opinion, culture, language, birth, or any other analogous or arbitrary ground.

Harassment can be violence, physical abuse, psychological abuse, emotional abuse, sexual abuse, gender-based abuse and racial abuse. Harassment does not require that physical violence or force materialises, it can also just be threatened.

#### **5. Types of Harassment**

Harassment can manifest in several different ways, such as:

- Physical attacks, simulated or threatened violence including gestures (such as raising your fist to strike a person);
- Verbal bullying including making threats, shaming, hostile teasing, insults, racist or sexist language; and
- Psychological abuse including emotional abuse, gaslighting, bullying or mobbing.



## **6. Sexual Harassment**

"Sexual harassment" is also a form of unfair discrimination. It occurs when the unwanted conduct is linked to the victim's sex, gender or sexual orientation. Sexual harassment can include same-sex harassment.

Sexual harassment is effectively any unwelcome attention of a sexual nature from a person who knows or ought to know the attention is unwelcome or unwanted.

Sexual attention becomes harassment if:

- The behaviour is persisted in, although a single incident can constitute sexual harassment;
- The recipient has made it clear that the behaviour is considered offensive; and/or
- The perpetrator should have known that the behaviour is unacceptable.

Previous intimate relationships will not influence whether harassment has taken place. Whether the conduct is wanted must be established in each and every instance.

## **7. Gender-Based Violence**

"Gender-based violence" is a form of harassment, as well as being a recognised human rights violation. Gender-based violence is abuse which disproportionately affects victims due to their gender. There is a difference between gender-based violence and sexual harassment. Gender-based violence is the broader category of conduct. Most of the time sexual harassment will also fall under gender-based violence. However, gender-based violence does not require that the conduct is of a sexual nature.

Gender-based violence usually occurs where a woman is exploited based on a perception of having reduced power between her and the perpetrator. This often includes physical violence or sexual abuse towards women, as they are able to be physically overpowered. It also often includes verbal abuse to reduce the woman's self-worth. Emotional abuse, such as gaslighting, belittling and humiliation, is another way that a perpetrator can exploit the perceived power differential between the perpetrator and the victim. Lastly, gender-based violence often manifests through financial abuse. A



perpetrator exploits a woman's financial dependence on them by using money as form of abusive control.

Ultimately, acts of gender-based violence are geared towards reducing the victim's dignity by exploiting a perceived weakness related to their gender.

While gender-based violence is more commonly an act by a man against a woman, it does not have to be. Any gender can be abused due to their gender. It is also possible for gender-based violence to occur within same-sex relationships. In this case, verbal, emotional and financial abuse are the more likely ways that the abuse will manifest.

Where conduct which meets the definition of harassment (section 4 above) is perpetrated on the basis of gender, Red Rocket will consider this to be an act of gender-based violence, which will be treated as an extremely serious form of harassment.

## **8. Racial Harassment**

"Racial harassment" occurs when persons or groups are treated poorly or offensively (or just in any manner which is unwanted) because of the colour of their skin, their race, nationality, or ethnic or national origins. The harassment can be verbal or physical and could also include attacks on a person's property.

Just like we have described above, racial harassment is unwanted conduct and it can either be a single act or a pattern of persistent actions. The conduct must also cause a hostile environment. The key factor is that the conduct must be related to the race of the victim.

When assessing a case of alleged racial harassment, the country's history of institutionalised racial discrimination must be considered. Language which is expressly racial will be presumed to be racial harassment until proven otherwise.

This is in addition to the test contained in section 4 above.





## 9. Procedures

An individual wishing to report a case of harassment to Red Rocket is required to do so in writing. An exception will only be made for individuals who are illiterate. In which case the report may be verbal.

Red Rocket has set up an email address and a WhatsApp account in order to receive reports about harassment from individuals outside of the Red Rocket Group. The details of these accounts are:

Email: [complaints@redrocket.energy](mailto:complaints@redrocket.energy)

WhatsApp number: [071 685 7845](tel:0716857845)

The individual is required to send an email, text message, or voicenote to the above account/s with the details of the report. He or she must include as much detail as possible so that Red Rocket is able to investigate the matter properly.

Should an individual reporting harassment wish to remain anonymous, they must not provide any details about their identity. It is also recommended that they use the WhatsApp account for reporting unless their email address does not identify them.

Red Rocket may contact the individual for further information. If the individual cannot be reached, then this may prevent Red Rocket from taking the investigation any further.

Red Rocket will provide the individual with an outcome of the investigation within 20 working days of receipt of the report.

If any individual is not satisfied with the outcome of the investigation, they are permitted to pursue their formal rights. This policy does not replace the civil and criminal recourses available to the individual against the perpetrator directly. For example, in South Africa, the individual may report the perpetrator to a law enforcement or police service, he or she may obtain a protection order against the perpetrator and/or he or she may pursue the perpetrator in the Equality Court in terms of the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000. If requested, and if Red Rocket is reasonably able to, Red Rocket will assist an individual to access these private recourses.





## 10. Outcome

If the investigation results in a finding that an employee of Red Rocket has perpetrated an act of harassment, Red Rocket will discipline the employee internally.

If the investigation results in a finding that an external person who has dealings with Red Rocket is the perpetrator of harassment. Red Rocket will address the matter with the external party as far as possible to ensure that no further harassment occurs.

## 11. Confidentiality

Red Rocket will ensure that reports of harassment are investigated and handled in a manner that ensures that the identities of the persons involved are kept confidential.

## 12. Revision and Approval History

Rev	Date	Updated by	Summary of changes	Reviewed by	Approved by
0	2023/09/28	Guy and Associates Incorporated	First issue	K. De Wet DocuSigned by: <i>Karin De Wet</i> DA32544F7523483... Head of HCCM	M. Brambilla DocuSigned by: <i>[Signature]</i> 723ECD400D2E4BF... CEO

