

MOBILITAS

Anti-Discrimination Procedure



CREATION AND MODIFICATIONS

VERSION	WRITTEN BY	VERIFIED BY	APPROVED BY	EVOLUTION	ACTIVITIES	DIFFUSION
V1	O. KLOPPERS ESG Coordinator 26/07/2024	R. WEBBER-GREEN Executive Assistant 06/08/2024	C. CASTRO CEO 19/08/2024	Creation	All	External
V2	O. KLOPPERS ESG Coordinator 01/04/2025	I. BARNER Executive Vice President 02/04/2025	T. DRACK Special Advisor of The Board 14/04/2025	Modification	All	External
V3	O. KLOPPERS ESG Coordinator 18/08/2025	A. BURDAIRON Deputy Quality Manager 18/08/2025	I. BARNER Executive Vice President 18/08/2025	Renewal	All	External

PROCEDURE :

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1. PURPOSE AND OBJECTIVE

The MOBILITAS Group is committed to fostering a positive, welcoming work environment for all employees in its subsidiaries and branches around the world. This procedure formalizes this commitment and aims to guide the MOBILITAS Group's subsidiaries in implementing anti-discriminatory practices.

Each staff member has a responsibility to contribute to the objectives set out in this procedure, by treating colleagues and stakeholders fairly and with respect. By embedding these values and challenging inappropriate behaviour, we foster a positive, harmonious and respectful work environment where everyone feels valued and respected.

2. STATEMENT

The MOBILITAS Group is proactively engaged in eliminating discrimination in all policies, practices, and procedures affecting our staff members and stakeholders.

Our goal is to promote fair treatment in all employment aspects, including recruitment, promotion, training opportunities, benefits, terms of employment, disciplinary matters, redundancy selection, and dismissal in accordance with local legislation and regulations in every country where we operate.

We employ, train, and promote employees based on their experience, abilities, and qualifications, ensuring equal opportunities for all wherever possible.

We are committed to fostering a welcoming workplace that accommodates and supports employees with disabilities, ensuring equal opportunities for all.

The subsidiaries of the MOBILITAS Group strive to provide a work environment where all employees are treated with respect and dignity, free from harassment, bullying and discrimination based on the protected characteristics in Chapter 3 of this procedure.

Employees are responsible for conducting themselves in accordance with this procedure and implementing it in their workspaces, ensuring fair opportunities and preventing discrimination, harassment, or bullying within their power.

The subsidiaries of the MOBILITAS Group will comply with applicable local legislation and associated codes of practice, ensuring fairness for employees and stakeholders in all areas of operation.

3. PROTECTED CHARACTERISTICS

In our mission to create a work environment free from discrimination, it is essential that each employee understands their role in preventing discrimination and harassment, and in supporting an open work environment.

Protected characteristics, which we value and respect, form the basis of our commitment to anti-discrimination and fairness. These characteristics should never be the grounds for discrimination, harassment, bullying or any other form of unfair treatment.

Instead, the MOBILITAS Group encourages employees to leverage these different characteristics to learn from each other's cultural differences, thereby enhancing our service offerings to clients and other stakeholders.

Protected characteristics for employees may include but are not limited to:

- Colour
- National origin or ethnicity
- Disability
- Marital status
- Pregnancy or maternity
- Veteran status
- Socioeconomic status
- Race
- Language
- Political affiliation or belief
- Citizenship status
- Sexual orientation
- Gender identity or expression
- Age

4. DEFINITIONS

To further clarify what is expected from our staff, the glossary below summarises the definitions of some of the key concepts of this procedure.

- **Bullying:** Refers to persistent, offensive, or intimidating behaviour that undermines an individual's performance, safety, or well-being, such as persistent unfair criticism, exclusion, or verbal abuse.
- **Harassment:** Refers to any unwanted behaviour that makes someone feel intimidated, degraded, or offended, related to personal characteristics like age, gender, race, or any of the other protected characteristics listed above.
- **Discrimination:** Refers to treating someone less favourably because of their characteristics, such as age, gender, or any of the other protected characteristics mentioned above. Discrimination is especially harmful in areas like hiring, promotion, or training.

5. DISTINCTION BETWEEN JOKES AND HARASSMENT

In our commitment to fostering a harmonious and respectful workplace, it is crucial for all employees to understand the boundary between acceptable behaviour and what constitutes harassment. Here is how to distinguish between jokes and harassment:

- **Intent vs. Impact:** While jokes may be intended as harmless, they can still be harmful. Harassment occurs when behaviour creates an intimidating, hostile, or offensive environment for others, regardless of intent.
- **Respecting Boundaries:** What one person considers a joke might be perceived as offensive by another. Always respect colleagues' boundaries and be mindful of how your words and actions might affect others.
- **Unwanted Conduct:** If behaviour, even if meant as a joke, is unwelcome and makes someone uncomfortable, it can be considered harassment. This includes comments, gestures, or actions related to the protected characteristics described in Chapter 3.
- **Response to Feedback:** If someone indicates that a joke or comment is inappropriate or upsetting, stop immediately. Continuing such behaviour after being asked to stop constitutes harassment.
- **Severity of Behaviour:** A single, severe incident can be considered harassment, even if it was intended as a joke. The impact on the person affected is what matters most.
- **Professional Environment:** Maintain professionalism at all times. Jokes or comments that undermine another's dignity or create discomfort are unacceptable, regardless of how they are framed.
- **Inclusivity and Respect:** Focus on creating an environment where everyone feels respected and valued. Harassment undermines this goal and will not be tolerated.

By understanding these distinctions, we can ensure that our workplace remains supportive, harmonious, and free from harassment.

6. REPORTING COMPLAINTS

The following process should be followed in case an employee wishes to raise a complaint linked to the guidelines set out in this procedure:

1. Employees shall first follow their branch's local HR reporting procedures.
2. If the complaint involves a direct supervisor, escalate it to the next line manager, such as a network manager.
3. If local procedures are not applicable or effective, report the complaint to the MOBILITAS Group's HR department.

All complaints will be treated seriously and confidentially. The investigation may involve interviews and written statements, and confidentiality will be maintained as much as possible.

The concerned parties will be informed of the investigation outcome and any actions taken. Disciplinary measures will be implemented if necessary.

Employees will not face penalties for making a complaint unless the complaint is found to be false and made in bad faith.

If a complaint is upheld and the harasser remains employed, the Group will discuss options to ensure that the aggrieved employee is not required to work with the aggressor.

Discrimination or harassment may result in disciplinary action, including warnings or dismissals. Line managers who fail to address such issues may face similar consequences.

7. RESPONSIBILITIES FOR THE MOBILITAS GROUP

To ensure this procedure's effective implementation, the MOBILITAS Group is committed to the following responsibilities:

- **Principles:** The MOBILITAS Groups must strive to meet the following principles as discussed in this procedure:
 - Eliminate discrimination across the MOBILITAS Group.
 - Eliminate bullying, harassment and discrimination across the MOBILITAS Group.
 - Promote a respectful and harmonious workplace in all policies, practices, and procedures.
- **Procedures:** The MOBILITAS Group is responsible for upholding the procedures explained in this document. This includes ensuring group-wide reporting mechanisms are available as outlined in this procedure.
- **Communication:** This procedure will be communicated to all employees upon its deployment. The procedure will be available at all times via the group's intranet. Additional communication materials (such as leaflets or mailers) will be made available upon request to all staff members, via esg@mobilitas.org.

- **Training:** The MOBILITAS Group will provide relevant training on this procedure and its contents, available via the group's training platform.
- **Updates:** The MOBILITAS Group's ESG department will review the contents of this procedure on an annual basis, expanding, adjusting and improving if required.
- **Monitoring/ reporting:** The MOBILITAS Group is responsible for monitoring this procedure's successful implementation. This will be done through annual performance monitoring across the group. Performance monitoring might include a data request from each subsidiary, and/ or an employee survey. Key figures will be included in the group's annual sustainability report.

8. RESPONSIBILITIES FOR OUR SUBSIDIARIES

To ensure this procedure's effective implementation, the MOBILITAS Group's subsidiaries bear the following responsibilities:

- **Principles:** Each subsidiary of the MOBILITAS Group is expected to uphold the following principles as discussed in this procedure:
 - Ensure fair treatment in all employment aspects, including recruitment, promotion, training opportunities, benefits, terms of employment, disciplinary matters, redundancy selection, and dismissal while respecting local legislation and requirements.
 - Employ, train, and promote employees based on their experience, abilities, and qualifications, ensuring fair opportunities for all whenever possible.
 - Ensure accessible facilities for people with disabilities, providing assistive technologies, and offering flexible work arrangements. Subsidiaries should implement necessary workplace adjustments and ensure that all policies and practices are bias-free for employees with disabilities if applicable.
 - Strive to provide a work environment where all employees are treated with respect and dignity, free from harassment, bullying and discrimination based on the protected characteristics described in Chapter 3 of this procedure.
 - Comply with applicable local legislation.
- **Procedures:** The MOBILITAS Group's subsidiaries are responsible for ensuring local reporting mechanisms are available as outlined in this procedure. Subsidiaries may request assistance from the group's HR department to draft local procedures in adherence to the group's guidelines.
- **Communication:** The MOBILITAS Group's subsidiaries are responsible for the effective communication of this procedure with their local staff members. Therefore, this procedure must be communicated to all new employees as part of their induction program. Additional communication materials (such as leaflets or mailers) may be requested via esg@mobilitas.org.
- **Monitoring:** The MOBILITAS Group is responsible for monitoring the success of the implementation of this procedure. To measure its impact, the MOBILITAS Group might request regular data submissions from each subsidiary. Subsidiaries must submit the requested data within the given timeframe.

9. RESPONSIBILITIES FOR OUR EMPLOYEES

To ensure this procedure's effective implementation, the employees of the MOBILITAS Group's subsidiaries bear the following responsibilities:

- **Principles:** Each employee is expected to uphold the following principles as discussed in this procedure:
 - Treat others how you wish to be treated yourself.
 - Respect the boundaries of other employees and stakeholders.
 - Support your colleagues and stakeholders whenever possible. For instance, a colleague with a disability may need assistance adjusting their workspace. Fellow employees should lend a hand where they can.
 - Ensure fair treatment of stakeholders in all interactions when representing the MOBILITAS Group or one of our subsidiaries, such as recruitment, sales or service delivery.
 - Report complaints through the reporting mechanisms outlined in Chapter 6 of this document.
 - Prevent discrimination, harassment, or bullying within your power.
- **Communication:** Employees must sign off that they have read and understood this procedure, as part of the quality management system's annual review. Employees are encouraged to participate in the relevant training on the group's training platform.
- **Monitoring:** Employees are required to provide accurate personal details to their branch manager when requested, provided that the request complies with local legislation.