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NON-DISCRIMINATION POLICY

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OVERVIEW

Issued By: Senior Director – Risk & Compliance, Group Director - HR

Approved: Dec 2022

Approved By: The Board Committee

Version:

FIVE endeavors to seek and employ the best-qualified personnel, to provide equal opportunity based on merit to all colleagues in recruiting, training, promoting, and providing career advancement and to administer these and all other employment-related activities in a non-discriminatory manner.

FIVE is a signatory to the United Nations Global Compact (UNGC) on its ten principles for human rights, labour, environment, and anti-corruption. In accordance with Principle 6 of the UNGC, there should be no discrimination in any aspects associated with access to employment, to particular occupations, promotion, training, vocational guidance, employment conditions such as recruitment, remuneration, hours of work and rest, and job assignments.

At FIVE, we value all employees and job candidates as unique individuals, and we welcome the variety of experiences they bring to our company. As such, we have a strict non-discrimination policy. We believe everyone should be treated equally regardless of their race, age, sex, caste, creed, ethnic origin, language, , color, family status, religion or belief, nationality and national origin, gender (including gender identity, gender expression, HIV status, sexual orientation, trade union membership, place of origin or social origin, and pregnancy, caring responsibilities, family circumstances marital status, disability, political ideology or Opinion, socio-economic background, national extraction, or genetic information, gender reassignment, or marriage and civil partnerships.

FIVE firmly condemns any acts of harassment or abusive behavior against any employees, third parties, customers or others and is committed to implement best practices and policies to advocate a culture of equality, inclusion and fairness across the organization. We ensure that all employment decisions are based only on valid role requirements and that employees are selected based on their ability to do the job and that there is no distinction, exclusion or preference made on other grounds.

APPLICABILITY

The rights and obligations set out in this policy apply equally to all employees, whether part time or full time on a substantive or fixed-term contract, and to associated persons such as secondees, volunteers (interns/placements), agency staff, contractors, guests, and others employed under a contract of service. This policy is also of relevance to directors, line managers and other employees concerned with recruitment, training and promotion procedures and employment decisions which affect others

This policy is applicable to FIVE Holdings and all its related group entities.

You may read this policy along with the *FIVE Equal Employment Policy* for further details on policy guidelines.

DEFINITIONS

Discrimination may be direct or Indirect:

1. Direct discrimination

Direct discrimination occurs where one person is treated less favorably than another because of a protected characteristic set out in this policy. By way of example, refusing to promote a pregnant employee on the basis that she is shortly due to go on maternity leave would be direct discrimination on the protected characteristic of the employee's sex. Other types of direct discrimination are:

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- **Associative discrimination** - this is direct discrimination against someone because they associate with another person who possesses a protected characteristic.
- **Perceptive discrimination** - this is direct discrimination against an individual because others think they possess a particular protected characteristic. For example, sexual orientation

2. Indirect discrimination

Indirect discrimination occurs when an unjustifiable requirement or condition is applied, which appears to be the same for all, but which has a disproportionate, adverse effect on one group of people. This is discrimination even though there was no intention to discriminate. For example, a requirement for UK based qualifications could disadvantage applicants who have obtained their qualifications outside of the UK; this could amount to indirect discrimination on the grounds of race.

3. Victimization

Victimization is where an employee is treated less favorably or unfairly. For example, victimization may occur where an employee has raised a genuine grievance and is demoted as a result.

4. Bullying

There is no legal definition of bullying. However, we regard it as conduct that is offensive, intimidating, malicious, insulting, or an abuse or misuse of power, and usually persistent, that has the effect of undermining, humiliating, or injuring the recipient. Bullying can be physical, verbal, or non-verbal conduct. It is not necessarily face to face and can be done by email, phone calls, online or on social media. Bullying may occur at work or outside work.

If the bullying relates to a person's protected characteristic, it may also constitute harassment and, therefore, will be unlawful.

5. Forced Labour

FIVE does not use any means that would force or compel the worker or threaten them with any penalty or mandatory contract to work with the company or force them to carry out a work or provide a service against their will.

6. Harassment

Harassment is unwanted conduct related to a protected characteristic that has the purpose or effect of:

- violating someone else's dignity; or
- creating an intimidating, hostile, degrading, humiliating or offensive environment for someone else

Sexual harassment is:

- conduct of a sexual nature that has the purpose or effect of violating someone's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- less favorable treatment related to sex or gender reassignment that occurs because of a rejection of, or submission to, sexual conduct.

- 7. **Union-based discrimination** - FIVE does not encourage any form of union discrimination i.e. to discriminate against any individuals because of their views on trade unions or for their participation in trade union activities.

ROLES AND RESPONSIBILITIES

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1. GROUP DIRECTOR OF HR – The Group Director of HR is centrally responsible for ensuring the adherence of this policy document. Dissemination of the policy through to all employees will be performed by the Group Director of HR
2. ETHICS AND COMPLIANCE COMMITTEE – All incidents reported through the reporting channels will be reported and documented by the Ethics and Compliance team. All incidents will be investigated as per procedures defined in the Grievance policy
3. DISCIPLINARY COMMITTEE – Support the investigation for any disciplinary incidents reported.
4. HEAD OF DEPARTMENTS – Required to ensure compliance to the policy in all facets of employment by application of non-discrimination and non-harassment guidelines.
5. PURCHASING MANAGER – is responsible to obtain sign-off from the suppliers on the Supplier Code of Conduct to monitor compliance to the labour rights and working conditions (including non-discrimination) to extend these principles to their employees for ensuring compliance to policy requirements.

PROMOTION OF EQUALITY, DIVERSITY, AND INCLUSION

FIVE is committed in creating and maintaining a working environment in which colleagues feel respected and recognized. Every employee has the right to work in a professional environment where their knowledge, skills, and abilities are critical factors in their success. FIVE expects all employees to maintain standards of propriety, promote equal opportunity, treat everyone professionally, and act without bias. Every colleague is responsible for creating and driving this culture – one that encourages diversity and inclusivity – and for fostering a workplace that is free of discriminatory practices.

Equal consideration will be given to specially-abled individuals according to their aptitude and abilities. Should a team member become disabled, every effort will be made to provide continued employment either in the same or an alternative position, with appropriate training being given as required. We shall develop and sustain positive measures to encourage the recruitment, development, and retention of people with disabilities and to make every effort to ensure the continued employment of any employee who becomes disabled while working for FIVE.

This policy applies to all conduct in the workplace and also to conduct outside of the workplace that is related to your work (e.g., at meetings, social events and social interactions with colleagues) or which may impact on FIVE's reputation (e.g. the expression of views on social media, contrary to the commitments expressed in this policy, that could be linked to FIVE). We set out below some specific areas of application:

- **Access to Employment:** The benefits, terms and conditions of employment and facilities available to FIVE's employees will be reviewed on a regular basis to ensure that access is not restricted by unlawful means and to provide appropriate conditions to meet the special needs of disadvantaged or under-represented groups. FIVE shall ensure that there is no discrimination made on the grounds of occupations, or any employment terms and conditions which may be favorable to a specific group. All individuals are provided equal access to employment opportunities at FIVE.
- **Recruitment:** Selection for employment at FIVE will be based on aptitude and ability through a structured interview framework. Where possible, FIVE will capture applicants' diversity demographics as part of its recruitment processes to promote the elimination of unlawful discrimination.
- **Training:** Trainings in concern with equality, diversity and inclusion matters will be provided by the HR Department to line managers and others likely to be involved in recruitment, performance management, talent management and other decision making.

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- **Remuneration:** FIVE strongly believes in equality of pay based on position, designation, work experience, roles and responsibilities for all its employees irrespective of gender which is a part of the broader diversity and inclusion as set out in the Equality Act 2010. FIVE grants equal remuneration to both male and female workers for the same work or another work of equal value
- **Promotion:** All promotion decisions will be made based on merit and will not be influenced by any of the protected characteristics listed above. FIVE has a formal performance evaluation criterion to fairly evaluate all its employees Promotion opportunities will be monitored to ensure equality of opportunity at all levels. Where appropriate, steps will be taken to identify and remove unnecessary or unjustifiable barriers to promotion.
- **Working and rest hours:** FIVE follows industry guidelines of working hours and rest for all its employees with detailed shift, rostering policies, and processes in place. FIVE ensures that there is no-discrimination in working and rest hours to employees based on occupation, department, or any other discriminatory factors (subject to requirements of respective departments/ employee grades).
- **Job assignments:** FIVE endeavors to not discriminate in providing job assignments or specific opportunities between its employees. All employees will be provided equal opportunity for job assignments and the same will be assigned as per the skillset and role requirement without discrimination.

DISABILITY AWARENESS

A person has a disability if they have a physical or mental impairment (i.e., blindness, deafness, heart disease, paralysis), or the impairment has a substantial and long-term adverse effect on the person's ability to carry out normal day-to-day activities. (i.e., learning disabilities and medically recognized illnesses)

FIVE is committed to ensuring that as far as reasonably practicable, our organizational environment is accessible to people with disabilities. We are ready to consider all reasonable adjustments that would, over time, help us to achieve this aim more fully and effectively.

Read the '*Policy on accessibility of infrastructure and services*' for more details.

Persons with physical handicaps will be considered for employment based on their capability for a particular job. The company will make reasonable accommodation to satisfy the needs of our handicapped team members.

In our efforts to deliver on this we have adopted the following principles:

- Update our training and education to reflect disability awareness/inclusion.
- Adjust how we disseminate this information to specially-abled individuals
- Hotel staff are available to assist any person that may require assistance with any aspect of their stay such as, check-in, portage, understanding the menu, etc.
- Organize disability awareness/inclusion training for all board, staff, and members.
- Review all areas in line with health and safety requirements.
- Improve on the physical layout out of the facilities that we use:
 - Ensure only disabled guests park in the parking area designated disabled parking

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- Ensure our disabled toilet is always fully accessible

MEASURES TO PREVENT SEXUAL HARASSMENT AND DISCRIMINATION

FIVE prohibits both racial and sexual harassment / any other harassment and / or abusive behavior in the workplace. FIVE has a zero-tolerance policy for sexual harassment or discrimination, racial harassment or discrimination, or any other form of harassment and discrimination (religious, language, sexual orientation).

Any dealings with third parties, including customers, suppliers, contractors, agency staff and consultants, must be free from discrimination, harassment, victimization or bullying. All team members are strongly encouraged to bring acts of discrimination, harassment, victimisation or bullying to the attention of the management or to assist the aggrieved team member/s to do so.

Every complaint will be appropriately investigated. Provided such information or assistance is given in good faith, all reasonable steps will be taken to provide the person making the complaint with protection from victimization. A closure report will be prepared irrespective of the investigation outcomes which will cover scenarios such as if the employee believes that something inappropriate happened, even if the investigation determines no inappropriate behavior occurred, a report will be prepared and the employees will be formally intimated regarding the same

Signs of Sexual Harassment:

- Sexual jokes, use of language or images
- Unsolicited physical contact
- Leering and staring at you
- Displaying rude and offensive material so that you or others can see it
- Inappropriate conduct based on sexual orientation or gender identity
- Questioning you about your sex life
- Behavior on a phone call that makes you feel uncomfortable
- Vengeance against colleagues who report harassment
- Unwarranted innuendoes – asking for sexual favors

Indicative examples of discrimination –

- Hiring managers disproportionately disqualifying male or female candidates on purpose
- Managers bypassing team members with specific protected characteristics (e.g. race) for promotion without being able to formally prove (e.g. with documentation) the reasons other employees were selected instead
- Sexist comments
- Emails disparaging someone's ethnic origin

FIVE will not tolerate any acts of unlawful or unfair discrimination (including harassment, abuse, violence) committed against an employee, contractor, job applicant or visitor because of a protected characteristic. Any such instances which violate the aspects of the equality and inclusion in forms of harassment, non-inclusivity or absence of equal opportunity should be reported through appropriate channels.

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WHAT CAN YOU DO?

No one warrants or asks to be harassed. Everyone has the right to work in an environment that's free from harassment, bullying, discrimination, and violence.

If you have been harassed, here are some things you can do:

- (a) **Talk to the offender:** You can try resolving the situation yourself by explaining to the person who is harassing you that their behaviour is unwanted. However, this is only recommended if it's something you feel safe and comfortable doing.
- (b) **Confide in a confidant:** Sexual harassment isn't something you need to deal with on your own. In the workplace, it might be worth talking to a Human Resources colleague, who will be able to help you decide what to do. You might also want to talk to a trusted colleague.
- (c) **Be informed:** If you're being harassed at work find out what their policies and procedures are for preventing and handling sexual harassment. They may have processes in place already to deal with these situations and support you.
- (d) **Keep a diary:** Document everything that happens, including when it occurred, the names of any people who saw what happened, and what you've done to try to stop it. It can be useful to bring these records when talking to a manager or HR person so that they know exactly what has been happening, and when.
- (e) **Save any evidence:** Keep text messages, social media comments, notes and emails. This evidence can also help if you make a complaint.

Provided such information or assistance is given in good faith, all reasonable steps will be taken to provide the person making the complaint with protection from victimization. Any individual found to be victimizing another team member would be liable for disciplinary action up to and including of dismissal. Human Resources has developed an appropriate process detailing anti-discrimination which nominates key leaders who are empowered to investigate and resolve complaints.

WHO CAN RAISE COMPLIANT(S)/CONCERN(S)?

Any Employee, Director or Business Partner of the Company may report a Complaint(s)/ Concern(s) through formal reporting channels. It is important that Complaint(s)/Concern(s) are reported promptly, so that they can be addressed in a timely manner.

WHAT CAN BE REPORTED?

FIVE endorses the principles of the Equality Act 2010 and is committed to the positive promotion of equality, diversity, and inclusion amongst all members.:

- sex;
- gender reassignment;
- disability;
- marital status;
- race, racial group, ethnic or national origin, or nationality;
- religion or belief;
- sexual orientation;

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- age;
- pregnancy or maternity;

GOVERNANCE

The HR department shall be the owner of this Policy and will work with all employees to ensure consistent application of this policy by:

- Ensuring all policies comply with and reflect the spirit of Equality legislation and guidelines for good practice. The HR department will be the custodians of equality, diversity and inclusion and provide constructive challenge when behaviors do not promote or demonstrate openness, inclusion, and diversity.
- Ensuring appropriate guidance and training is provided to support managers to take responsibility for their own behaviors and the behaviors of those they manage.
- Ensure regular reviews and development of this policy as appropriate, and that any amendments or updates remain consistent with the equality, diversity, and inclusion principles.

FIVE will do all it can to promote good practice in this area to eliminate discrimination and harassment as far as is reasonably possible. All employees at FIVE have the following responsibilities with respect to adhering the Equality, Diversity, and Inclusion Policy:

- Actively encourage non-discriminatory practices and to report any incidences of behavior that fail to comply with this Policy.
- Be aware of and support this Policy in carrying out their duties.
- Treat fellow employees, members, job applicants, associates, and clients with respect and without discrimination or harassment and to raise any concerns regarding inappropriate behavior with their line manager or HR.
- Undertake appropriate equality, diversity, and inclusion training.

On receipt of a discrimination complaint, the HR team jointly with the Ethics and Compliance and the Disciplinary Committee shall perform a detailed investigation to identify similar claims, track metrics, obtains testimonies and conducts interviews. Refer the '*Grievance policy*' for details.

SENSITIVITY AND CONFIDENTIALITY

Anyone involved with an informal or formal complaint about bullying or harassment, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties. If a person is found to have breached confidentiality or acted without due care or sensitivity in a case of bullying or harassment, we may take disciplinary action against the person up to and including dismissal (or other appropriate action for non-employees).

MEASURING POLICY EFFECTIVENESS/MONITORING

We will measure the effectiveness of this policy by:

- Collecting and reviewing quantitative and qualitative data including:
 - ✓ recruitment and selection of employees at FIVE
 - ✓ complaints, linked to the range of protected characteristics, including harassment, bullying, and grievances proceedings for employees and guests
 - ✓ employee equality, diversity and inclusion training
- Publishing annual diversity data regarding the demographics of our workforce, for example in Gender Pay Gap Reporting and the Annual Report

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To ensure that this policy and other procedures are operating effectively, The HR department at FIVE will continue to monitor and measure performance and ensure that any patterns or trends are identified and resolved.

Our policy will be reviewed annually to ensure that equality and diversity is continually promoted in the workplace and the company environment prevents discrimination and harassment.

TRAINING AND COMMUNICATION

The policy statement is disseminated throughout the hotel, posted in prominent locations permanently and brought to the attention of all new team members during orientation. All new joiners are required to attend trainings on equality, diversity and inclusion along with prevention of discrimination and harassment as a part of their onboarding programme. Every current employee must attend trainings on annual basis.

We expect all our people to proactively support our initiatives by attending events and workshops organised by the human resource to educate themselves on the challenges faced by others and how to help alleviate these in the workplace.

FIVE disseminates this policy information through quarterly townhalls, awareness flyers additionally to all its employees and obtains their acknowledgement to confirm the understanding of this policy.

The Group Director of HR and all Leadership Colleagues are responsible for ensuring that this policy is reflected in supporting policies and documents and is applied by team members within their areas of control.

STRATEGIC TARGETS

As a part of FIVE's Sustainability initiatives, strategic objectives, targets and action plans have been formulated for the promotion of equality, diversity and inclusion in the workplace as follows –

Strategic Objective	Metric	Target
Ensuring equality, diversity, and inclusion	Integration of policies and processes to enhance equality, diversity, and inclusion	To develop a specific training program that facilitates EDI on a quarterly basis (for increasing gender diversity in the organization) <ul style="list-style-type: none">- Perform 4 trainings with all head of departments to provide equal opportunity to genders and incorporate inclusion in their hiring practices- Monitor progress against these targets half-yearly through meetings with the Discrimination and EEO Committee to solicit feedback from stakeholders for identifying areas of improvement to ensure that the organization remains committed to its diversity and inclusion goals- Implementation of our 'Flexi working hours' policy where practical/ possible which will support our objective of aiding our employees to balance work and family responsibilities

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	Employee Gender Ratio	<p>Improve the existing gender diversity ratio to 25% by 2027 and 30% by 2030 (Our current gender ratio at 20% is higher than the national UAE average of 17.72% and 19.4% for Dubai)</p> <ul style="list-style-type: none"> - Open positions for all genders - Employee training for avoidance of any form of bias in hiring - Perform gender diversity pay audit for the organization to identify anomalies and providing equal pay across genders
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HUMAN RIGHTS DUE DILIGENCE MONITORING AND REPORTING

FIVE acknowledges that human rights due diligence is an ongoing activity, and the guidelines need to be always adhered to. FIVE will monitor its own operations continuously to identify and assess any actual or potential adverse impacts and where necessary, respond effectively to resolve identified issues. FIVE has developed a detailed human rights due diligence process which covers the human rights risk and impact assessment. FIVE performs a periodic human rights risk and impact assessment which includes planning and scoping, data collection and baseline development, risk assessment, impact mitigation, and reporting and evaluation.

This is done through detailed internal review processes, external stakeholder assessments such as surveys to assess risk and impact of human rights and develop and implement any necessary mitigation plans through audits.

GRIEVANCE REDRESSAL

FIVE aims to create workplaces in which open and honest communications among all colleagues are valued and respected. Colleagues and Workers have access to grievance reporting mechanisms and may report without prejudice, with anonymity respected.

If any colleague comes faces any conflict or issues which endangers their human rights or violates any existing guidelines related to harassment, bullying, abuse or discrimination, then the colleague, contractor or any other related persons may report the Complaint(s)/Concern(s) to his immediate Supervisor or Line Manager, Any members of Discrimination policy Committee or the Ethics and Compliance Committee, or through the hotline number or available registered email ID of –

Ethics and Compliance Email ID: ethics@fiveglobalholdings.com;

Ethics Helpline Contact Number: **+971-42475270**

In case of an adverse human rights situation, FIVE shall take adequate measures by participating in effective operational-level grievance mechanism and resolving such complaints through investigation conducted by the Ethics and Compliance Committee.

All colleagues and third parties have an option to remedies to go forward and report such incidents to relevant local authorities in case of a severe infringement to any of the above fundamental human rights.

For detailed policy, refer 'Grievance Policy' for the complaint management process.

REVIEW

The policy is reviewed by the Group Director of HR on an annual basis to make any amendments to this document. In case you have any questions or concerns regarding this policy, please reach out to the Human Resources team for assistance.

Discrimination, Harassment and EEO Committee:

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NAME	POSITION
Disha Kapur	Group Director of Human Resources
Faruq Sheikh	Group Director of Security
Vartan Zakarian	Director of Front Office and Residences
Mohammed Abo Saleem	Director of Front Office
L. Sailo	Director of Housekeeping
Sonal Malhotra	Recruitment Manager - Human Resources
Priyanka Joshi	Human Resources Manager - FJV
Markus Rapatz	General Manager - FZ
Angelina A.	Human Resources Manager - FZ
Mercy Joseph	Assistant Manager -Security