

ANTI-RACISM POLICY

	NAME	DESIGNATION	DATE
Approved	Social and Ethics Committee	Social and Ethics Committee	November 2020
Reviewed	Executive Committee	Executive Committee	August 2020
Compiled	Thabo Moabi	Group Human Resources Manager	August 2020

1. OVERVIEW

Grindrod is committed to the prevention and elimination of racism and / or racial harassment and strives to establish a workplace free from racial prejudice and unfair discrimination. This policy is designed to establish a formal framework and foundation for achievement of this vital goal.

2. PURPOSE

The purpose of this policy is to:

- 2.1 Eradicate racism and racial harassment in every workplace and at each organisational level within Grindrod.
- 2.2 Promote a culture of anti-racism and inclusivity, informed by the rights to human dignity and equality.
- 2.3 Recognize and appreciate the need to identify and implement measures to redress the disadvantages experienced by designated groups within the spirit and purport of the applicable legislative framework.
- 2.4 Establish an environment that facilitates the resolution of complaints and grievances relating to race relations – in a manner which promotes unification of the organisation through a common stance against racism and racial harassment.
- 2.5 Unequivocally prohibit all forms of racism and racial harassment within Grindrod.

3. SCOPE

The principles set out in this policy are applicable to all Grindrod stakeholders.

4. DEFINITIONS

- 4.1 “**Complainant**” refers to the person alleging that conduct constituting racism and / or racial harassment has occurred. This person may or may not be the person directly affected by racism and / or racial harassment and is not necessarily an employee of Grindrod.
- 4.2 “**Complaint**” means a complaint concerning allegations of racism and / or racial harassment.
- 4.3 “**Racism**” means:
- 4.3.1 the advocacy or expression in any manner of the belief or attitude that any person, by virtue of his or her membership of a specific racial group, is to be treated as inferior or superior to others; and / or
- 4.3.2 having an unfavourable or discriminatory attitude or belief towards an individual or group of people, primarily based on their membership of a specific racial group.
- 4.4 “**Racist**” means that which is characterised by racism.
- 4.5 “**Racial harassment**” means conduct or expression which is racist in nature and which is calculated to demean, humiliate, distress, or create a hostile or intimidating environment.
- 4.6 “**Stakeholder**” shall mean all directors, employees, business partners, suppliers, contractors and anyone else representing Grindrod’s interests.

5. COMMITMENT TO ANTI-RACISM

- 5.1 As an organisation whose dealings are underpinned by the values of Integrity, Respect, Fairness, Transparency, Accountability and Professionalism, racist conduct is considered a serious threat to the ethical vision of the company.
- 5.2 It is for such primary reason that Grindrod prohibits all forms of racism and racial harassment within and related to its workplaces and is committed to conduct which is free from racism and racial harassment.
- 5.3 Such aforementioned commitment will include:
- 5.3.1 Dealing with complaints of racism and racial harassment with sensitivity, confidentiality and expediency
- 5.3.2 Respecting the rights to dignity and equality of both the complainant and alleged perpetrator of racism and / or racial harassment by carrying out a full and fair investigation process
- 5.3.3 Allowing the complainant the opportunity to choose an informal (i.e. discussions and / or correspondence with the alleged perpetrator) or formal route (i.e. disciplinary process), as a means of eradicating the unwanted conduct

- 5.3.4 Taking appropriate action to address and eliminate racism and / or racial harassment which employees may be subjected to by other stakeholders and / or external third parties with whom Grindrod has dealings with
- 5.3.5 Implementing any other measure needed to promote harmony and eradicate all forms of racism and racial harassment in the workplace.

6. STAKEHOLDER RESPONSIBILITIES

- 6.1 Grindrod stakeholders, and employees in particular, bear the shared responsibility to eradicate the ills of racism and racial harassment within their realm of control.
- 6.2 This responsibility includes, but is not limited to:
 - 6.2.1 Familiarising themselves with this policy
 - 6.2.2 Conducting themselves in inclusive, affirming and enabling ways and refraining from committing acts of racism and / or racial harassment
 - 6.2.3 Reporting and escalating complaints relating to racism and racial harassment as soon as reasonably possible, and within the grievance procedures in place, to ensure the conduct is eliminated in a procedurally and substantively fair manner
 - 6.2.4 Understanding and appreciating the rich diversity, history and the basic human rights (i.e. equality and dignity), which form part of the fabric of society
 - 6.2.5 Respecting the confidential and sensitive nature of complaints of racism and / or racial harassment and not unduly circulating inflammatory information that could cause disharmony and / or incite tension in the workplace
 - 6.2.6 Conducting themselves in a responsible and non-racist manner on social media and on other public platforms that could potentially indicate affiliation to the company
 - 6.2.7 Report only instances where there is a bona fide belief that an act of racism or racial harassment has occurred.

7. DISCIPLINARY OFFENCES AND SANCTIONS

- 7.1 In accordance with the provisions of its Disciplinary Policy, Grindrod considers acts of racism and / or racial harassment a form of unfair discrimination.
- 7.2 Subject to the merits of a matter, acts of racism and / or racial harassment committed by employees of Grindrod will accordingly attract serious disciplinary action, which may lead to termination of employment.
- 7.3 Due to the potential harm and / or damage that may be caused by false allegations of racism and / or racial harassment, should an allegation of racism and / or racial harassment be found to be of a malicious and / or grossly unsubstantiated nature however, such conduct may also attract serious disciplinary action, which may lead to termination of employment.

8. EXTERNAL PARTIES

- 8.1 In the event an employee within Grindrod is subjected to any form of racism and / or racial harassment by an external third party (e.g. customer, clients and / or other third parties with whom Grindrod has dealings with) during the course and scope of their employment, such employee is encouraged to report such incident to their Line Manager and / or Human Resources Manager.
- 8.2 Once such incident has been reported by an employee:
- 8.2.1 The relevant Line Manager and / or Human Resources Manager will escalate such complaint to a member of Senior Management within the relevant Grindrod division
 - 8.2.2 The relevant Senior Manager to whom the complaint is referred to in terms of clause 8.2.1 will:
 - 8.2.2.1 Formally communicate such complaint to the external third party and request an investigation into such complaint and
 - 8.2.2.2 Advise the affected employee on the feedback received by the external third party, which may include a request to provide witness testimony in any disciplinary process that may be initiated by the external third party.
- 8.3 Whilst Grindrod may not have managerial prerogative over the decisions and / or actions taken by external third parties, Grindrod will nevertheless take all reasonable steps to address such complaint with the external party in order to obtain clarification and / or prevent repetition of the conduct complained off.

9. RELATED POLICIES

This policy must be read together with the:

- 9.1 Grindrod Code of Ethics
- 9.2 Grindrod Grievance Policy and
- 9.3 Grindrod Disciplinary Policy