



ELITE CONSTRUCCIONES S.L.

PUNTA EUROPA, MALABO, GUINEA ECUATORIAL

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ANTI-BULLYING AND HARASSMENT POLICY

Bullying is harmful to the employees of Elite Construcciones, resulting in reduced productivity, efficiency and morale, and increased absenteeism and turnover. In providing a productive working environment, Elite Construcciones believes that its employees should be able to enjoy a workplace free from all forms of bullying and harassing conduct.

It is against the policy of the Company for any employee, whether a manager, supervisor, or co-worker, to bully another employee. This policy applies to all company activities and events, as well as publically accessible off-duty activities including social media.

Prohibited bullying occurs whenever there is severe, repeated mistreatment that targets one or more persons which, through verbal abuse, offensive conduct, or interference, that creates an intimidating, hostile, or offensive working environment; interferes with a person's work performance; or otherwise adversely affects a person's employment opportunities with the Company.

Bullying conduct could include, but is not limited to, repeated and aggressive:

- Teasing, name-calling, slandering, ridiculing, maligning, a person or his/her family
- Screaming, shouting, yelling, or swearing at another in public or private
- Persistent phone calls, voicemails, emails, or postings to or about another person
- Unreasonable public criticism, reprimands, or trivializing of another's work
- Excluding others from meetings or social situations, or giving the "silent treatment"
- Destructive gossip, rumours or innuendo
- Physical pushing, shoving, throwing things
- Non-verbal threatening gestures or glances, staring or glaring
- Intentional interference with another's work, for example, through impossible deadlines, supplying insufficient or incorrect resources or information.

Evaluative work performance comments by one's supervisor relating to deficiencies, constructive feedback, and counselling are appropriate and reasonable and do not constitute bullying behaviour.

Any employee who believes he or she has been bullied in violation of this policy should report the conduct immediately to his or her supervisor; or, if that person is responsible for the behaviour, to the Human Resources Department. The employee always has the option of reporting the conduct directly to the Human Resources Department if he or she prefers.



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A thorough and impartial investigation of all complaints will be conducted in a timely and confidential manner. Confidentiality will be maintained during the investigation to the extent possible without jeopardizing the thoroughness of the investigation.

Any employee of the Company who has been found, after investigation, to have bullied another employee in violation of this policy will be subject to a required apology, counselling, training and/or disciplinary action up to and including termination.

Retaliation against the individual reporting the bullying behaviour is expressly prohibited.