Anti-Discrimination & Anti-Harassment Policy

1. Purpose

Under the Lakefront Code of Conduct, every member of the Lakefront team commits to fostering a diverse and inclusive organization and to protecting each other against all forms of harassment and discrimination, including sexual harassment. Our aim is to ensure that every one of us is safeguarded from any type of discrimination and/or harassment, regardless of our sex, gender identity, race or any of the other characteristics that make us who we are. We each commit to treat one another as we wish to be treated, with respect and dignity, enabling everyone to contribute fully and have equal opportunities within the company.

In the event that you experience or witness something that concerns you, this policy will help you to determine whether the actions in question qualify as discrimination and/or harassment, including sexual harassment. It will also guide you on how to report incidents.

2. Scope

This document applies to the entire Lakefront group. We recognize that there are some countries where specific laws and regulations apply, and we will always comply with these. However, regardless of geography, we will maintain the high standards set out in this Policy even if local laws and customs do not require this.

All Lakefront employees are required to adhere to this Policy and any third party who provides services to, or otherwise represents Lakefront, must comply with this Policy, or demonstrate an equivalent policy which applies within their own organization.

3. Definitions

Discrimination*: Any distinction, exclusion or preference made on the basis of age, race, color, sex, gender, sexual orientation, disability, religion, political opinion, national extraction, social origin, HIV/AIDS status or trade union membership, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation.

*Based on criteria set out in the International Labour Organization and Principle 6 of the UN Global Compact

Harassment: A range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm. This includes but is not limited to gender-based violence and harassment, intimidation, bullying and mobbing.

Sexual Harassment: Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature are defined as sexual harassment when:

- The offensive behavior creates an intimidating, abusive, or hostile work environment, or interferes with work performance
- An employment decision is connected to the employee's response to the offensive behavior (e.g. a reward is offered such as promotion or pay rise in return for cooperation or the employee faces negative consequences for not cooperating with the behavior).

Anybody can be a victim of sexual harassment, regardless of their sex or gender identity and that of the offending party.

4. General principles

At Lakefront, our position is simple; we treat one another as we would wish to be treated, with equity respect and dignity, enabling everyone to contribute fully and enjoy equal opportunities within the company. This means that we will not treat anyone differently on the basis of protected characteristics (see discrimination definition above).

This right to freedom from discrimination and harassment extends to all of us, including full-time, part-time, temporary, probationary, casual and contract staff as well as volunteers, interns and apprentices.

We also expect the same standards from those with whom we work and thus extend the same obligations to our vendors and suppliers.

This document applies at every level of the organization and to every aspect of the workplace environment and employment relationship, including recruitment, selection, promotion, transfers, training, salaries, benefits and termination. It also covers rates of pay, hours of work, holidays, discipline and performance evaluations.

It is also applicable to work-related events that occur outside of the physical workspace such as business trips or company parties or social events.

In ensuring that we avoid discriminatory behavior, we must take into account both the intent and impact of our decisions. Even when the intent is appropriate, a decision or action which creates a negative impact upon an individual or group of individuals within one of the protected characteristics, can still be considered discrimination.

Lakefront will provide an appropriate environment to support these principles, including:

- Providing training and education so that everyone understands their rights and responsibilities
- Monitoring organizational systems and processes to identify issues and/or areas for improvement
- Providing a mechanism for individuals who experience or witness discrimination and/or harassment to raise concerns (see Reporting Process below)
- Promoting appropriate standards of conduct at all times and at all levels in the organization

5. Reporting process

At Lakefront, we strive to create an environment in which we all feel safe and empowered to speak up if we see something wrong. Therefore, if you believe that you are the target of any type of harassment or discrimination, we encourage you to raise this directly with the person or people involved, either verbally or in writing, but only if you feel comfortable in doing so. We know however that there are circumstances where you may not feel comfortable doing this and when that is the case, there are alternative options available to you;

- You can report the matter to your Human Resources Department or
- You can use the appropriate Speak Up channel (see the Lakefront Speak Up Policy).

If your report is found to be substantiated, Lakefront will take appropriate corrective action and also ensure that you are protected from retaliation. You can find more information on the Lakefront anti-retaliation principle on the intranet.

6. Roles and responsibilities

Everyone at Lakefront is expected to uphold and abide by this policy, by refraining from any form of harassment or discrimination and by fully cooperating in any investigation relating to a complaint of harassment or discrimination.

Managers have the additional responsibility to act immediately on observations or allegations of harassment or discrimination by reporting this to Human Resources or via one of the Lakefront Speak-Up Channels. Managers are also responsible for creating and maintaining a harassment and discrimination free organization and should address potential problems before they become serious.