

Equal Opportunity Policy

I Introduction

- 1-1 Shinryo (Hong Kong) Limited is committed to making full use of the talents, skills, experience of different people, and to making sure that it is an organisation where they are respected and valued and can achieve their full potential, regardless of their **sex, marital status, pregnancy, family status, disability and/or race, sexual orientation** (hereinafter called as ‘the Conditions’).
- 1-2 Shinryo (Hong Kong) Limited will comply with the Sex Discrimination Ordinance, Family Status Discrimination Ordinance, Disability Discrimination Ordinance and Race Discrimination Ordinance and will follow recommendations in the Code of Practices issued by the Equal Opportunities Commission under the Ordinances;
- 1-3 Shinryo (Hong Kong) Limited will comply with the Code of Practice against Discrimination in Employment on the Ground of Sexual Orientation issued by the Government of Hong Kong SAR.

II Objectives

- 2-1 The objectives of this policy are to ensure that:-
- (1) Everyone is treated with respect and dignity and no one will be subjected to any unwelcome conduct, or to an environment that is hostile or intimidating on the ground of the Conditions.
 - (2) No one will be treated less favourably on the ground of the Conditions;
 - (3) Opportunities for employment, training and career development are equally open to all qualified people regardless of the Conditions;
 - (4) The grievance system is properly administered regardless of the Conditions; and there will be no reprisal against anyone raising concerns or complaints or taking action on discrimination or harassment on the ground of sex, marital status, pregnancy, disability and/or race.

III Discrimination

- 3-1 The Company does not tolerate direct or indirect discrimination based on the Conditions;
- 3-2 Direct discrimination is to treat anyone less favourably because of the Conditions;

- 3-3 Indirect discrimination is to allow some one because of his or her sex, marital status, pregnancy, family status, disability and/or race suffer a detriment from any requirements or conditions which cannot be justified on valid reason.

IV Harassment

- 4-1 Sexual Harassment or harassment on the ground of the Conditions is unacceptable. Harassment is behaviour that is not welcome, not asked for and not returned, and which is likely to cause an uncomfortable workplace by humiliating, seriously embarrassing, offending or intimidating someone. All employees are responsible for their own actions and should not engage in potentially offensive behaviour. It is not necessary for the person being harassed to have to tell you that they were humiliated or offended by the behavior;
- 4-2 See the enclosed Harassment Behaviour for reference.

V Vilification

- 5-1 Vilification of an employee because of the Conditions is unacceptable. Vilification is any activity in public that incites hatred, serious ridicule or contempt of a person because of their disability/race. Where such behaviour includes threats of harm or property damage, it may constitute serious vilification, which is a criminal offence.

VI Victimization

- 6-1 The Company will not disadvantage any staff member for complaining about unlawful conduct in this workplace or for helping someone else to do so. We take reports of discrimination, harassment, vilification and victimization very seriously and will handle such complaints as quickly, confidentially and fairly as possible.

VII Grievance Procedure

- 7-1 This policy will be a priority for Shinryo (Hong Kong) Limited. The Company will not tolerate any form of harassment and is committed to reducing and preventing it.
- 7-2 If any alleged act of discrimination, harassment, vilification, victimization occurs, staff concerned is encouraged to use the following internal grievance procedures. The procedures are as follows:

- (1) Staff concerned will keep a written record of the incident so as to be able to recall exactly what has happened and report to the supervising manager or General Manager
 - (2) If the supervising manager or General Manager is not in a position to comment, the staff concerned may direct his or her complaints to the Head of Human Resources & Administration Department.
 - (3) The Head of Human Resources & Administration Department will investigate and submit a report to the President. A copy will be provided to the staff concerned. Confidentiality will be kept. The President will decide a course of action after receiving the report.
 - (4) When the Human Resources & Administration Department or any of its member is involved, the complaint will be filed directly to the Vice President who oversees this Department.
- 7-3 Anonymous letter will not be accepted unless traceable and hard evidence are presented.

VIII Compliance with the Policy

- 8-1 It is the responsibility of all staff members of the Company to understand and comply with this policy, whether performing their company duties in or outside Hong Kong;
- 8-2 Staff members found to have breach this policy will be disciplined and, in serious cases, dismissed.
- 8-3 Any enquiries about this policy can be made to Human Resources & Administration Department .



President

Victor Cheung King Wah

Date:

Harassment Behaviour

Following behaviours which are not exhaustive are strictly prohibited.

Sexual Harassment

- (1) Unwelcome sexual advance such as leering, lewd gestures, touching, grabbing or deliberately brushing up against another person;
- (2) Unwelcome requests for sexual favours such as suggestions that sexual co-operation or the toleration of sexual advances may further a person's career;
- (3) Unwelcome verbal, non-verbal or physical conduct of a sexual nature such as sexually derogatory or stereotypical remarks; persistent questioning about a person's sex life; and/or
- (4) Conduct of a sexual nature that creates a hostile or intimidating work environment such as sexual or obscene jokes around the workplace; displaying sexist or other sexually offensive pictures or posters; displaying or transmitting sexist or other sexually offensive materials through the Company network or Work station.

Harassment on the ground of Disability, Race, Pregnancy, Marital Status, Family Status, Sexual Orientation

- (1) Making derogatory remarks or insults for example, name calling which persons with a particular disability may find offensive or impolite;
- (2) Display of offensive slogans or other objects;
- (3) Jokes, banter, ridicule or taunts;
- (4) Exclude or marginalize staff members from office activities;
- (5) Unnecessarily picking.