

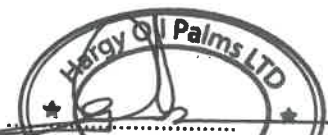


Basic Principle

1. Hargy Oil Palms Ltd is committed to ensuring a harmonious and productive work environment for its employees. This commitment recognizes that the work place should be free of sexual harassment. Sexual harassment is unwanted, unwelcome and offensive behaviour and will not be tolerated under any circumstances.

Scope

2. Hargy Oil Palms Ltd supports a strict implementation of the relevant laws and regulations punishing sexual harassment in the countries where it operates.
3. Sexual harassment can take many different forms and may include physical contact, verbal comments, "jokes", propositions, the display of offensive material or other behaviour.
4. All reports of sexual harassment will be dealt with in a sympathetic and confidential manner to help achieve fair hearings of the reports. No employee is to be victimized for reporting sexual harassment.
5. Sexual harassment applies equally to all genders.
6. Co-workers should be treated in a respectful and courteous manner, respectfully of their sensibilities.
7. Employees who feel that they are being sexually harassed are encouraged to express that the behaviour is not welcome and/or offensive. If the behaviour continues then the incident or behaviour should be reported to the relevant company authority.
8. Charges of sexual harassment, where substantiated, will result in disciplinary action up to and including dismissal, and may also lead to legal action.
9. False and malicious accusation regard to sexual harassment, where substantiated, will result in disciplinary action up to and including dismissal, and may lead to legal action.
10. All Hargy Oil Palms Ltd operations make available appropriate ways of reporting cases where a person in a position of authority (eg a manager) is allegedly part of the problem. Such reporting options can be a dedicated phone number, a drop box, an email address, or other options as determined appropriate locally and always ensuring the confidentiality of the reports.
11. Non compliance with this policy will result in disciplinary action up to and including dismissal, and may lead to legal action.
12. This Policy applies to all departments under the Management of Hargy Oil Palms Ltd


Craig Gibsone
General Manager