



EMAS DINAMIK (828558-V)

ANTI BULLYING AND HARASSMENT POLICY

Purpose & Commitment

EDSB is unwavering in its commitment to a workplace free from bullying and harassment, including sexual assault and sexual harassment (SASH). We believe every person deserves dignity, respect, and safety. This policy establishes our zero-tolerance stance, outlines clear procedures for reporting and resolution, and affirms our dedication to prevention, support, and accountability.

Scope

This policy applies to:

- **All Personnel:** Employees/Crew, managers, executives, trainees, by-standers, 3rd party contractors, visitors.
- **All Workplace Interactions:** On-site (vessel, office, warehouse), off-site (business trips, events), virtual spaces (video calls, messaging), and interactions with clients, suppliers, contractors or visitors.
- **Prohibited Conduct:** Unwanted behaviour impacting the work environment, whether a single severe incident or persistent actions.

Definitions

The following are definitions for this policy framework:

- **Bullying:** Repeated unreasonable behaviour that intimidates, degrades, or humiliates an individual.
- **Harassment:** Unwelcome conduct affecting the dignity of an individual, including verbal, physical, visual, or psychological forms
- **Sexual Harassment:** Unwelcome conduct of sexual nature, requests for favours, or other verbal/physical conduct.
- **Sexual Assault:** Any non-consensual sexual act or contact.
- **Prohibited conduct:** Include but not limited to Insults, name-calling, or mocking; Threats or intimidation; deliberate exclusion from meetings or communications; undue criticism or undermining of professional performance; sexist, racist, or discriminatory remarks or jokes
- **By-stander:** Any individual who observes or becomes aware of behaviour constituting bullying, harassment, sexual harassment, assault, discrimination, retaliation, or other misconduct but is not directly involved as the target or perpetrator.

Responsibilities

- **EDSB:** Prevent misconduct through training, clear policies, and promoting respect. Investigate reports promptly, fairly, and confidentially. Impose appropriate disciplinary action. Provide support. Prohibit retaliation.
- **All Personnel:** Treat everyone with respect. Report observed or experienced misconduct promptly. Participate cooperatively and honestly in investigations. Support affected colleagues.
- **Master, Managers & Supervisors:** Model respectful behaviour. Address inappropriate conduct immediately. Ensure reports are escalated timely. Support affected team members. Maintain strict confidentiality.

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- **By-stander:** Disrupt unsafe situations before escalation. Provide evidence collaborations to strengthen investigations and validate targets' experiences.
- **Target:** Remove oneself from immediate danger. Preserve evidence. Report when ready. Accept offered protections. Participate in investigations.

Reporting Misconduct

You are expected to report any incident you experience or witness:

- **Primary Channels:** Your immediate supervisor/manager, Human Resources or Crewing, or the Designated Person Ashore.
- **Alternative Channel:** If reporting to the above is not appropriate (e.g., the supervisor is involved), contact a senior manager or the Head of Department.
- **External Options:** You have the right to report to relevant external authorities (e.g., Police).
- **Confidentiality:** Reports will be handled with maximum possible confidentiality. Information is shared only with those who need to know to investigate or take action.
- **Report Requirements:** Date/time/location, involved parties, witnesses, incident description, evidence (e.g., messages, images)

Investigation & Resolution

- **Prompt & Fair:** All reports will be assessed promptly. Investigations will be conducted impartially by in-house personnel.
- **Process:** Involves gathering evidence (interviews, documents), maintaining confidentiality, and keeping the reporter reasonably informed of progress.
- **Outcomes:** Findings will be based on evidence. If misconduct is substantiated, appropriate disciplinary action will be taken, up to and including termination of employment/contract. Outcomes will be communicated to relevant parties as appropriate.
- **False Reports:** Maliciously false or bad-faith reports are a serious breach of this policy and will result in disciplinary action.

Support & Protection

- **Immediate Support:** Affected individuals including by-standers will be offered immediate support, which may include counselling, medical assistance, or temporary work adjustments.
- **Representation:** Right to a support person (colleague) during interviews.
- **No Retaliation:** EDSB strictly prohibits retaliation in any form. Any retaliation will be treated as a serious, separate violation subject to disciplinary action.

Prevention & Culture

EDSB will:

- Provide regular exposure on this policy, recognizing misconduct, bystander intervention, and reporting.
- Foster open communication and psychological safety.
- Empower bystanders to safely speak up or intervene.
- Integrate respect and inclusion into core operations and management expectations.
- Regularly review and update this policy and related procedures.

Accountability

Upholding this policy is a fundamental condition of engagement within EDSB. Violations will result in disciplinary action including dismissal. Department Heads are accountable for enforcing this policy and modelling respectful behaviour. We all share the responsibility to create and maintain a safe, respectful, and inclusive environment.



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MANAGING DIRECTOR

01 August 2025