01/09/2026

Prohibition of unfair discrimination Policy

1. PURPOSE

The purpose of this policy is to provide the rules and guidelines to prevent and manage unfair discrimination in **Gordon's Bay Security Trust / (Pty) Ltd**.

Gordon's Bay Security Trust / (Pty) Ltd recognises the rectification of previous legislation which prevented designated groups of people from having access to equal opportunities in terms of education, employment and growth and will ensure to address historical imbalances by eliminating unfair discrimination and implementing transformation.

2. POLICY STATEMENT

a) **Gordon's Bay Security Trust / (Pty) Ltd** will ensure to eliminate any form of direct or indirect unfair discrimination against any employment policy or practice, on one or more grounds including race, gender, sex, pregnancy, marital status, family responsibility, ethic or social origin, colour, sexual orientation, age, disability, religion, HIV status, conscience, belief, political opinion, culture, language, birth or on any other arbitrary ground;

b) Any distinction, exclusion or preference based on the inherent requirements of a particular job or made to give effect to the implementation of any employment equity plan will not constitute unfair discrimination;

c) **Gordon's Bay Security Trust / (Pty) Ltd** will endeavour to ensure that all its policies, procedures, practices and the workplace environment are free of any form of unfair discrimination;

d) It will be a violation of company policy and will constitute serious misconduct for any staff member to unfairly discriminate against an individual whether directly or indirectly, in any employment decision on any grounds as set out in a. above and management will ensure that witnesses/complainants are not victimized in any way;

e) It will be a violation of company policy to unfairly discriminate against any employee in any decision for the promotion of any person or the award of any privilege or benefit or the determination of any form of remuneration;

f) All employees are expected to conduct themselves with dignity, courtesy, and respect the self-esteem and worth of other individuals. Consequently they should refrain from committing any acts of unfair discrimination;

g) All advertisements for positions at **Gordon's Bay Security Trust / (Pty) Ltd** must be free of any element of unfair discrimination;

h) All procedures for the interviewing and assessment of job applicants must be free of any direct or indirect unfair discriminatory content;

i) No testing or assessment of candidates for employment which is biased against any racial, cultural or ethnic group shall be used by **Gordon's Bay Security Trust / (Pty) Ltd**;

j) No wage policy or differentiation based on any of the grounds as set out in clause 2. a. above, shall be permitted at **Gordon's Bay Security Trust / (Pty) Ltd**;

k) All amenities or facilities shall be free of direct or indirect discrimination within **Gordon's Bay Security Trust / (Pty) Ltd**;

3. DEFINITIONS

a) Unfair discrimination is any act of distinction, exclusion or preference made based on a ground which is not related to the inherent requirements of the job, or which has the effect of reversing or weakening equality of opportunity in the treatment of employment or occupation, or which has no other recognized rational justification;

b) Direct unfair discrimination is any distinction , exclusion or preference based on any one of the characteristics as set out in 2.a above that is not justified by the inherent requirements of a particular job or not in the pursuance of affirmative action in terms of the employment equity plan;

c) Indirect unfair discrimination occurs when the result of any measures or practice which appears to be impartial or unbiased, has the effect of creating an inequality of opportunity or treatment based on any of the characteristics as set out 2.a.

4. PROCEDURE FOR DEALING WITH DISCRIMINATION GRIEVANCES

a) Any employee or group of employees who believe that they have been unfairly discriminated against on any one of the grounds as set out in 2. a. above, have the right to lodge a formal grievance with the appropriate direct supervisor, stating the nature, extent and impact of the alleged unfair discrimination and the remedy sought. Should the employee or group of employees feel that the complaint has a direct link with the direct supervisor, the grievance may be lodged with the Human resource department.

b) Line management and Human Resource department will investigate the reasons and facts provided for the grievance and will submit the findings to the relevant Employment Equity committee.

c) The Employment Equity committee will endeavour to gain full understanding of the aggrieved employees' claims, and test the facts in order to determine whether valid grounds exist for a claim of unfair discrimination. A representative of the aggrieved employee or group, who may be a shop steward; employee representative; or co-worker, as well as the accused employee, will be entitled to state their cases before the Employment Equity committee.

d) Should the Employment Equity Committee find that there are grounds to support the aggrieved employees' claim of unfair discrimination, it will submit its findings together with a proposal of how to remedy or remove the discrimination to the applicable Management Committee for consideration and decision. In those instances where the Employment Equity committee is unable to reach consensus on a conclusion or recommendation, the viewpoints form the various constituencies represented on the committee will be submitted to the Management Committee for consideration;

e) The decision of the management committee will then be conveyed to the aggrieved employee(s) with reasons;

f) Should the aggrieved employee/employees not accept the decision by the Management Committee, such aggrieved employee(s) may declare a dispute, which will be handled in terms of the provisions of the Employment Equity Act;

g) In those instances where the Management Committee is of the opinion that prima facia evidence may exist that an act of unfair discrimination contrary to the policies and practices of **Gordon's Bay Security Trust / (Pty) Ltd** may have been committed by a member of staff, the staff member concerned may be subjected to disciplinary action on terms of the Disciplinary Procedure.

5. AUTHORISATION

5.1 Top Management has the authority to approve changes or exceptions to this policy at any time with or without notice, provided such changes are in compliance with legal or regulatory requirements and other policy guides Top Management has the authority to approve changes or exceptions to this policy at any time with or without notice, provided such changes are in compliance with legal or regulatory requirements and other policy guides.