



BLUE PALM



BP-POL-005

Equality, Dignity at Work & Anti-Harassment Policy

Fair opportunity, respectful conduct, safe reporting and impartial response

Blue Palm expects a workplace where decisions are fair, dignity is protected and nobody has to tolerate harassment, bullying or retaliation.

VERSION	1.0
STATUS	Final draft – formal approval required
POLICY OWNER	Nominated Compliance Officer – Mr. Hiua Schuani
APPROVAL AUTHORITY	CEO – Mr. Hiua Schuani
APPLIES TO	Blue Palm personnel and relevant third parties in Federal Iraq, the Kurdistan Region and the UAE/Dubai

1. Purpose and scope

Blue Palm is committed to equal opportunity, dignity and a workplace free from harassment. This policy applies to recruitment, pay, allocation of work, training, promotion, performance, discipline, termination and every work-related setting, including customer or supplier sites, accommodation provided for work, social events, travel, messaging and online communication.

It applies to employees, applicants, temporary workers, contractors, visitors and third parties interacting with Blue Palm personnel.

2. Equality and fair treatment

Blue Palm will not discriminate directly or indirectly because of sex, pregnancy or maternity, race, colour, nationality, national or social origin, ethnicity, religion or sect, age, disability or health status, marital or family status, trade-union membership or activity where lawful, or any other personal characteristic unrelated to the genuine requirements of the role.

- Use clear role criteria and, where practicable, more than one reviewer for hiring and promotion.
- Provide equal pay for the same work or work of equal value, subject to lawful differences supported by objective evidence.
- Consider reasonable, lawful adjustments to enable a person with a disability or health need to work safely and effectively.
- Do not retaliate against a person for requesting an adjustment, family-related right, lawful leave, fair pay, equal treatment or participation in an investigation.
- Monitor patterns in recruitment, pay, training, promotion, discipline and exit proportionately to workforce size and lawful data rules.

3. Prohibited conduct

Conduct	Meaning and examples
Harassment	Unwanted conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. A pattern is not always required.
Sexual harassment	Unwanted sexual conduct, requests, messages, images, comments, touching, invitations, pressure or promises/threats linked to work.
Bullying	Repeated or serious misuse of power, threats, shouting, ridicule, isolation, impossible demands, sabotage or deliberate humiliation. Firm, fair management is not bullying.
Violence or abuse	Physical assault, threat, stalking, intimidation, verbal or psychological violence, including conduct linked to work travel or accommodation.
Retaliation	Any detriment because a person raised, supported or was believed to have raised a concern, or refused discriminatory or harassing conduct.
Third-party harassment	Prohibited conduct by a customer, supplier, driver, agent, visitor or other non-employee. Blue Palm will take reasonable protective action.

Intent is relevant but not decisive: a person may breach this policy even if they meant to joke or did not intend harm. Context, impact, frequency, power imbalance and reasonable perception will be considered.

4. Reporting options

- If safe and desired, tell the person the conduct is unwelcome or ask a manager to do so. This is optional.
- Report to a manager, the Nominated Compliance Officer or the alternative channel in BP-POL-003. Bypass anyone involved or conflicted.
- Ask for immediate protective measures if there is a safety, retaliation, reporting-line or accommodation concern.
- Use a competent external authority or adviser where permitted. Blue Palm does not require internal reporting before lawful external action.

5. Assessment and investigation

1. Listen respectfully, record the concern in the reporter's own terms, assess immediate safety and explain confidentiality limits.
2. Appoint an impartial investigator with no conflict; use an external investigator for a senior, sensitive or conflicted case where appropriate.
3. Set proportionate interim measures—such as reporting-line, schedule, location or contact changes—without penalising the person who raised the concern.
4. Give the respondent a fair opportunity to understand and respond to material allegations at the appropriate stage; preserve evidence and hear relevant witnesses.
5. Decide findings based on the evidence and internal standard appropriate to the process; document reasons, action and appeal or review route.
6. Inform the parties of the outcome to the extent lawful, protect privacy and monitor retaliation and workplace recovery.

NO FORCED CONFRONTATION

Blue Palm will not require a complainant to confront the respondent or take part in mediation. Informal resolution or mediation is considered only where the affected person freely agrees and the matter is suitable.

6. Corrective action

Action may include coaching, apology, training, management instruction, workplace adjustment, warning, removal from supervisory duties, discipline, dismissal, supplier controls or contract termination, subject to law and proportionality. Blue Palm will also correct systemic causes such as poor supervision, biased criteria, unsafe accommodation or retaliation risk.

Roles and responsibilities

Role	Core responsibility
CEO	Approves the policy; sets the tone; authorises high-risk exceptions or relationships; ensures adequate resources and independent escalation.
Nominated Compliance Officer	Maintains the legal register, advice channel, risk records and registers; coordinates training, screening, investigations and annual review.
Managers and supervisors	Apply the controls in daily decisions, create a respectful environment, prevent retaliation and escalate concerns without delay.

Role	Core responsibility
All workers	Read and follow the policy, complete required training, keep accurate records, ask when unsure and report suspected breaches.
Recruiting and decision managers	Use documented, role-related criteria; record objective reasons for material employment decisions; seek review where bias or conflict may arise.
Investigator / decision-maker	Acts impartially, respects confidentiality and fair process, documents reasons and recommends individual and systemic remedies.
Customers, suppliers and visitors	Respect this policy while interacting with Blue Palm people; cooperate with protective and contractual action.

Training, records and monitoring

Training

Induction must cover the parts of this policy relevant to each role. Refresher training is required at least annually for exposed roles and when a material change occurs. Training may be brief and practical, but attendance and comprehension must be recorded.

Minimum records

- Role criteria, decision notes and objective reasons for pay or status differences.
- Adjustment requests and outcomes, with sensitive information restricted.
- Complaint, investigation, outcome, corrective-action and retaliation follow-up records.

Proportionate indicators

- Workforce patterns reviewed proportionately to size.
- Complaints by theme, work area and age—not reported in a way that identifies individuals.
- Time to triage and close cases; overdue remedies.
- Repeat concerns or manager areas requiring intervention.

Records must be accurate, access-controlled and retained for the period required by applicable law, contract and Blue Palm's retention schedule. Personal data and sensitive reports must be restricted to those with a legitimate need to know.

Breaches, protection and review

A breach may result in corrective action or discipline up to and including dismissal, subject to applicable law and a fair process. Third-party breaches may lead to remediation plans, suspension, termination, recovery of loss and reporting to a competent authority where required.

Blue Palm prohibits retaliation against anyone who raises a concern, assists an investigation or refuses conduct they reasonably believe would breach law or this policy. Deliberately false or malicious allegations may be addressed through a fair disciplinary process; a concern that is not substantiated is not, by itself, misconduct.

The Nominated Compliance Officer will review this policy at least annually, after a significant incident, and when relevant law, sanctions, licensing conditions or operations change. Material changes require CEO approval.

Legal and standards reference

This section is a concise implementation map, not a complete statement of the law. The current official text, local legal advice and the applicable entity or licence conditions must be checked before relying on a provision.

Instrument	Relevance to this policy
Federal Iraq Labour Law No. 37 of 2015, including Articles 6, 8–11 and 53	Prohibits discrimination, forced labour and sexual harassment/hostile environments and requires equal wage treatment in Federal Iraq. official/source text
Iraq Labour Law No. 71 of 1987, as applied in the Kurdistan Region at the policy date	Provides the principal KRI employment framework; current protections and procedures must be confirmed locally. official/source text
UAE Federal Decree-Law No. 33 of 2021 Regulation of Labour Relations, including Articles 4 and 14, as amended	Prohibits discrimination, sexual harassment, bullying and specified violence and requires equal pay protections in the UAE. official/source text

Voluntary European and international benchmarks

ILO Declaration on Fundamental Principles and Rights at Work — [source](#)