

NON DISCRIMINATION & EQUAL OPPORTUNITY POLICY

OBJECTIVE & PURPOSE OF POLICY

Capital Trust Limited (CTL) is committed to promote equal employment opportunities and a workplace that is free of all forms of discrimination and harassment. The objective of this policy is to ensure that all CTL employees or potential employees do not suffer unfair discrimination and have equal opportunity based on relevant abilities and merit. CTL commitment to equal opportunity promotes an inclusive work environment that values and accepts the diverse cultural and social backgrounds of its employees.

POLICY

This policy statement affirms CTL to be an equal opportunity employer and recruit, hire, train, and promote at all levels the most qualified applicants without regard for race, ethnicity, age, color, religion, sex, gender, national origin, sexual orientation, transgender/transsexual identity, economic class, educational background, physical or mental disability, medical condition and marital status. All such decisions are made on the basis of individual qualifications as they relate to the requirement of a particular job. All other personnel decisions, such as compensation, benefits, layoffs, recall, staff development, and training will be administered disregard to the above mentioned Factors.

IMPLEMENTATION

This policy is publicly available throughout the Company and clearly communicated to all employees in a manner in which it can be understood through induction programmes, policy manuals and intranet portals.

The implementation of the policy is the responsibility of the Unit's HR Department. Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained at all offices and are open to verification by any authorized personnel or relevant statutory body.

Any employee, board member or client who believes that he/she or any other affiliate of Organization has been discriminated against is strongly encouraged to report this concern promptly to the Head Compliances. CTL is committed to maintain a workplace that is free of any such harassment and will not tolerate discrimination against its employees. Employees are encouraged to take positive action towards promoting equal opportunity throughout the organisation.

MONITORING & AUDIT

Corporate Internal Audit undertakes audit and assessment annually. Corporate Human Resources

Undertakes random checks of records, annually.