

ANTI-HARASSMENT AND NON- DISCRIMINATION POLICY

JANUARY 2026

POLICY NUMBER: TMG-SEC-023

APPROVAL AUTHORITY: BOARD OF DIRECTORS



THE MAZI GROUP

1. PURPOSE

This Anti-Harassment and Non-Discrimination Policy establishes The Mazi Group's commitment to maintaining a workplace free from harassment, discrimination, and retaliation. Every employee deserves to work in an environment where they are treated with dignity and respect. This policy applies across all brands: Mazi Beauty, Glam Switch, On The Go Mists, and Upvendo.

2. SCOPE

This policy applies to:

- All employees, including executives and managers
- Contractors, temporary workers, and interns
- Job applicants
- Vendors, clients, and visitors
- All work-related settings: offices, remote work, travel, events
- All brands and geographic locations

3. POLICY STATEMENT

The Mazi Group prohibits:

- Harassment of any kind
- Discrimination based on protected characteristics
- Retaliation against those who report concerns or participate in investigations

Violations will result in disciplinary action, up to and including termination.

4. PROTECTED CHARACTERISTICS

Discrimination and harassment based on the following are prohibited:

- Race, color, or ethnicity
- National origin or ancestry
- Religion or creed
- Sex, gender, or gender identity
- Sexual orientation

- Age
- Disability (physical or mental)
- Genetic information
- Veteran or military status
- Marital or family status
- Pregnancy or related conditions
- Citizenship or immigration status
- Any other characteristic protected by law

5. HARASSMENT DEFINED

5.1 General Harassment

Harassment is unwelcome conduct based on a protected characteristic that:

- Creates an intimidating, hostile, or offensive work environment
- Unreasonably interferes with work performance
- Affects employment decisions

5.2 Examples of Harassment

- Slurs, epithets, or derogatory comments
- Offensive jokes or ridicule
- Stereotyping or negative generalizations
- Threatening or intimidating behavior
- Displaying offensive images or materials
- Mocking accents, customs, or beliefs
- Excluding individuals based on protected characteristics

5.3 Sexual Harassment

Sexual harassment includes:

- **Quid Pro Quo:** Conditioning employment benefits on sexual favors
- **Hostile Environment:** Unwelcome sexual conduct that creates an intimidating, hostile, or offensive environment

5.4 Examples of Sexual Harassment

- Unwelcome sexual advances or propositions
- Requests for sexual favors
- Sexual comments, jokes, or innuendos
- Commenting on physical appearance inappropriately
- Displaying sexually explicit materials
- Unwelcome physical contact
- Sexual gestures or leering
- Spreading sexual rumors
- Sending sexually explicit messages or images

6. DISCRIMINATION DEFINED

Discrimination is treating someone unfavorably because of a protected characteristic in:

- Hiring and recruiting
- Compensation and benefits
- Job assignments and promotions
- Training and development
- Performance evaluations
- Discipline and termination
- Any other term or condition of employment

7. RETALIATION PROHIBITED

Retaliation against anyone who:

- Reports harassment or discrimination in good faith
- Participates in an investigation
- Opposes discriminatory practices
- Exercises rights under this policy

is strictly prohibited. Retaliation is a serious violation and will result in disciplinary action.

7.1 Examples of Retaliation

- Termination or demotion
- Negative performance reviews
- Exclusion from meetings or opportunities
- Hostile treatment or ostracism
- Threats or intimidation
- Spreading rumors about the reporter

8. REPORTING PROCEDURES

8.1 How to Report

If you experience or witness harassment, discrimination, or retaliation, report it immediately to:

- Your manager (unless they are involved)
- Human Resources
- Any member of management
- Ethics Hotline (anonymous option available)
- hr@mazigroup.us

8.2 What to Include

- Names of individuals involved
- Description of the conduct
- Dates, times, and locations
- Names of witnesses
- Any documentation or evidence

8.3 Manager Responsibilities

Managers who receive a complaint or observe harassment must:

- Take the report seriously
- Report to HR immediately
- Not attempt to investigate independently

- Maintain confidentiality
- Not retaliate or allow retaliation

9. INVESTIGATION PROCESS

9.1 Investigation Principles

- All complaints are taken seriously
- Investigations are prompt and thorough
- Investigations are fair and impartial
- Confidentiality is maintained to the extent possible
- Both parties have opportunity to respond

9.2 Investigation Steps

1. Receive and document complaint
2. Assess need for interim measures
3. Interview complainant
4. Interview accused
5. Interview witnesses
6. Review relevant documents and evidence
7. Make findings and conclusions
8. Determine appropriate action
9. Communicate outcomes to parties
10. Document investigation

9.3 Interim Measures

During investigation, interim measures may include:

- Separating the parties
- Temporary reassignment
- Administrative leave
- Modified work arrangements

10. CONSEQUENCES

Employees who violate this policy are subject to disciplinary action, including:

- Verbal or written warning
- Required training
- Demotion
- Suspension
- Termination

The severity of discipline depends on the nature and severity of the conduct, prior violations, and other relevant factors.

11. FALSE REPORTS

Making a knowingly false report is a violation of this policy and may result in disciplinary action. However, a report made in good faith that is not substantiated is not a false report.

12. CONFIDENTIALITY

- Reports are kept confidential to the extent possible
- Information is shared only on a need-to-know basis
- Parties should maintain confidentiality during investigation
- Complete confidentiality cannot be guaranteed

13. THIRD-PARTY HARASSMENT

Harassment by non-employees (customers, vendors, visitors) is also prohibited. Report such harassment to your manager or HR. The company will take appropriate action, which may include:

- Addressing the behavior with the third party
- Limiting contact with the third party
- Ending the business relationship

14. REMOTE WORK AND DIGITAL COMMUNICATIONS

This policy applies to all work-related communications, including:

- Email and messaging platforms
- Video conferences
- Social media
- Text messages
- Any other digital communication

15. TRAINING

- All employees receive harassment prevention training
- Managers receive additional training on responsibilities
- Training is provided at hire and periodically thereafter
- Training meets state-specific requirements (e.g., California, New York)

16. ROLES AND RESPONSIBILITIES

16.1 All Employees

- Treat others with respect
- Refrain from harassment and discrimination
- Report concerns
- Cooperate with investigations
- Complete required training

16.2 Managers

- Model appropriate behavior
- Address inappropriate conduct
- Report complaints to HR
- Prevent retaliation
- Support a respectful environment

16.3 Human Resources

- Receive and investigate complaints
- Advise on policy interpretation
- Recommend disciplinary action

- Maintain records
- Provide training

17. EXTERNAL RESOURCES

Employees may also file complaints with external agencies:

- U.S. Equal Employment Opportunity Commission (EEOC)
- State fair employment agencies
- Local human rights commissions
- Relevant agencies in other jurisdictions

18. RELATED POLICIES

This policy should be read in conjunction with:

- TMG-SEC-021: Code of Conduct and Business Ethics
- TMG-SEC-022: Diversity, Equity, and Inclusion Policy
- TMG-SEC-024: Employee Handbook and Workplace Policies
- TMG-SEC-027: Whistleblower Protection Policy

19. POLICY REVIEW

This policy shall be:

- Reviewed annually by HR and Legal
- Updated for legal changes
- Approved by executive leadership
- Communicated to all employees

20. DEFINITIONS

- **Harassment:** Unwelcome conduct based on a protected characteristic that creates a hostile work environment or affects employment decisions.
- **Sexual Harassment:** Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.
- **Discrimination:** Unfavorable treatment based on a protected characteristic.

- **Retaliation:** Adverse action against someone for engaging in protected activity.
- **Protected Activity:** Reporting concerns, participating in investigations, or opposing discriminatory practices.

To report harassment or discrimination:

Human Resources Department

Ethics Hotline (anonymous reporting available)