



Gates Industrial Corporation plc Anti-Harassment and Discrimination Policy

Policy Statement

Gates Industrial Corporation plc is dedicated to the principles of equal employment opportunity and the fostering of a workplace free from unlawful harassment or discrimination. Gates prohibits unlawful discrimination or harassment against employees and other covered persons (including interns, applicants, contract or temporary workers) on the basis of age, race, color, sex, sexual orientation, gender identity or expression, transgender status, religion, national origin, ancestry, citizenship, disability, veteran or marital status, genetic information, pregnancy, childbirth or related medical conditions, or any other applicable status protected by federal, state or local law (collectively, “protected categories”).

Harassment

Gates strives to maintain a work environment free of unlawful harassment and work place violence. Unlawful harassment can be any single incident or a pattern of behavior where the effect, intentional or unintentional, creates a hostile, offensive, or intimidating work environment based upon one or more protected categories. Prohibited behavior may include, but is not limited to, the following:

- Written or visual forms such as cartoons, e-mail, posters, drawings, photographs, or social media posts.
- Verbal conduct such as the use of obscenities, derogatory comments, slurs, negative stereotyping or jokes.
- Physical conduct such as assault, blocking an individual’s movements, or acts of violence (both verbal and nonverbal).

Prohibited conduct can also include inappropriate comments or conduct between or among individuals in the same protected category. Such harassment, whether committed by employees, supervisors, managers, consultants, clients, customers, vendors, or other individuals doing business with Gates, will not be tolerated. All employees and non-employees (customers, clients, vendors, consultants, etc.) are expected to conduct themselves in a professional and business-like manner at all times.

Sexual Harassment

In addition to other forms of harassment, Gates’ policy prohibits sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and/or other verbal or physical conduct of a sexual nature, regardless of the sex of the persons involved, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment;

- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Prohibited conduct includes, but is not limited to, sexually implicit or explicit communications whether in:

- Written or visual forms, such as cartoons, e-mail, posters, calendars, drawings, photographs, social media posts, or inappropriate adult-themed gifts.
- Verbal form, such as comments, jokes, foul or obscene language, gossiping, questions about another's sex life, unwelcome sexual advances, or repeated unwanted requests for dates.
- Physical form, such as leering, gestures of a sexual nature, or inappropriate touching, whether welcome or unwelcome.

Discrimination

Gates does not tolerate unlawful discrimination in any business dealings, or in employment or employment-related decisions including recruiting, hiring, compensation, promotion, benefits, discipline, termination, job assignments or training. Gates is committed to providing equal employment opportunities to all persons.

Unprofessional Behavior

Gates does not tolerate unprofessional behavior, such as bullying, aggressive or threatening comments or conduct, inappropriate horseplay, stereotyping, practical jokes, or use of offensive language. While this behavior may or may not constitute harassment, it nevertheless may be offensive to co-workers, customers, or vendors, and is inconsistent with Gates' standards of professional conduct and ethics.

Complaint Procedure

If you are being subjected to conduct that you believe violates this policy, you should:

- Step 1:** If comfortable, tell the offending person that such conduct is not welcome and request that such conduct stop immediately.
- Step 2:** Immediately report the conduct to your supervisor. However, if you believe it would be inappropriate to discuss the matter with your supervisor or you are uncomfortable discussing the matter with your supervisor, you may report the matter to another person in your supervisory chain, the appropriate Human Resources representative, the Gates Law Department (compliance@gates.com), or anonymously through the Ethics and Compliance Hotline:

Online form: gatescorp.ethicspoint.com

Phone: as listed in Annex A of the Code of Conduct or as found on gatescorp.ethicspoint.com

Step 3: If additional incidents occur, you should immediately report them to your choice of the individuals listed above.

Gates is committed to enforcing this Anti-Harassment and Discrimination policy. The effectiveness of the Company's efforts depends in part on employees reporting inappropriate workplace conduct. If you feel that you or someone else may have been subjected to conduct that violates this policy, you should report it immediately.

Any reported incident will be objectively investigated by the Company in a timely and thorough manner. Gates will maintain appropriate documentation and tracking to ensure reasonable progress is made. At the close of the investigation, Gates will consider appropriate options for remedial actions and resolutions. If misconduct is found, Gates shall take prompt corrective action, as appropriate. Complaints and actions taken to resolve complaints of harassment or discrimination will be handled as confidentially as possible.

Management's Role

It is the responsibility of Gates' managers to appropriately report any concerns of harassment, discrimination or unprofessional behavior that are brought to their attention. If a manager receives a report that this policy has been or may have been violated, or observes conduct that may violate this policy, he or she must contact Human Resources immediately so that an investigation can be conducted and corrective action taken, if appropriate.

Retaliation

Gates prohibits retaliation against any employee (including interns, applicants, contract or temporary workers) by another such person, including supervisors and managers, for reporting, filing, testifying, assisting, or participating in any manner in a harassment or discrimination investigation, proceeding, or hearing, conducted either by the Company or a government enforcement agency.

If you perceive that you are being retaliated against for making a report or for your participation in an investigation, please follow the complaint procedures outlined above. The situation will be investigated appropriately.

False Allegations

Gates takes all allegations very seriously and prohibits the use of the complaint procedure contained in this policy for improper, malicious or ill-intended purposes. Accordingly, Gates will take corrective action, up to and including termination, against any employee who abuses Gates' harassment and discrimination complaint procedure by knowingly lodging a false complaint or by knowingly giving false information during the course of an internal investigation.

Violations

Any violation of this policy, including retaliating against a person who brings a claim pursuant to this policy, may result in discipline up to and including termination. Further, any manager or supervisor who receives a report of harassment or discrimination and fails to notify the Company will also be subject to disciplinary action, up to and including termination of employment.

Who to Contact

For questions or concerns with this policy, contact your supervisor, Human Resources, or the Gates Law Department (compliance@gates.com).