



# **POLICY ON PROTECTION AGAINST HARASSMENT AT WORKPLACE**

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**SAZGAR ENGINEERING WORKS LIMITED**

## PURPOSE

The purpose of this policy is to communicate special emphasis on protection of employees throughout the SAZGAR ENGINEERING WORKS LIMITED (SEWL) so that harassment incidents can be prevented, compliance with local laws and code of conduct on protection against harassment at the work place can be achieved.

This policy applies to all employees of the Company.

## INTRODUCTION

We have a zero-tolerance policy towards harassment of any kind, including but not limited to sexual harassment, discrimination, bullying, and intimidation. All employees are expected to treat each other with respect and professionalism, and to refrain from engaging in any form of harassing behavior.

## DEFINITION

Harassment is defined as “any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment”.

## OBJECTIVE

SEWL aims to prevent harassment from taking place, and, where necessary, to act upon complaints of harassment promptly, fairly, judiciously, and with due regard to confidentiality for all parties concerned.

## TYPES OF HARASSMENT

### a. Abuse of authority

A demand by a person in authority, such as a supervisor, for sexual favors in order for the complainant to keep or obtain certain job benefits, be it a remuneration increase, a promotion, training opportunity, a transfer or the job itself.

### **b. Creating a hostile environment**

Any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature, which interferes with an individual's work performance or creates an intimidating, hostile, abusive or offensive work environment.

The typical "hostile environment" claim, in general, requires finding of a pattern of offensive conduct, however, in cases where the harassment is particularly severe, such as in cases involving physical contact, a single offensive incident will constitute a violation.

### **c. Retaliation**

The refusal to grant a sexual favor can result in retaliation, which may include limiting the employee's options for future promotions or training, distorting the evaluation reports, generating gossip against the employee or other ways of limiting access to his/her rights. Such behavior is also a part of the harassment.

## **APPLICATION OF THE POLICY**

### **➤ Competent Authority**

The CEO shall be the competent authority for this policy.

### **➤ Inquiry Committee**

- The inquiry committee shall comprise of the following:

<b>Name</b>	<b>Designation</b>	
Mrs. Sana Suleyman	Non-Executive Director	Chairperson
Mr. Mian Muhammad Ammar Hameed	Executive Director marketing	Member
Mr. Brig. Imran Ijaz	G.M Corporate Affairs	Member
Mr. Arshad Ijaz	Head of Human Resource and Administration Department	Member

- In case a complaint is made against one of the members of the Inquiry Committee that member shall be replaced by another for that particular case. The CEO (competent authority) may also alter the composition of the Inquiry Committee on a case-to-case basis to address the valid objections of any of the parties involved in the inquiry.

#### ➤ **Powers of the Inquiry Committee**

The inquiry committee shall have the authority to:

- Summon and enforce attendance of accused and complainant and make inquiry regarding the complaint lodged.
- Call any witness for inquiry to facilitate the investigation.
- Acquire any relevant evidence to further enhance their understanding of the case.
- Recommend appropriate actions against the accused and false complainant.

#### ➤ **Complaint Proceedings**

- The complaint must be lodged with the Head of HR&A, who will refer it to the inquiry committee for investigation and recommendations, within 15 days of the complaint received.
- Complaints of harassment may be filed against any SEWL employee.
- The Inquiry Committee will hear statements from the complainant, accused, and witnesses as needed, and review relevant documents and evidence.
- Statements and evidence gathered during the inquiry process will remain confidential.
- Both the complainant and accused have the right to be accompanied by a SEWL colleague.
- The Inquiry Committee will ensure that the accused does not create a hostile environment to pressure or influence the complainant.

- The Inquiry Committee will present its findings, recommendations, and final decisions to the CEO (competent authority), within 45 days or such time as is allowed by the CEO.
- If the Inquiry Committee finds the accused guilty, it will recommend to the CEO (competent authority) one or more penalties as deemed appropriate.
- The organization may offer compensation to the complainant, if required considering the severity of the circumstances.

#### ➤ **Proceedings on False Complaint**

In case the allegation of harassment found to be false by the inquiry committee through its thorough findings; the CEO may impose penalty on the complainant as he deems appropriate depending upon the severity of the allegation.

### **REVIEW AND REVISION**

This policy is effective from June 29, 2024 and it can be reviewed at any time to make it more effective and to bring it in line with the best practices and legal requirements.



## **Code of Conduct for Protection Against Harassment**

All employees:

- Shall behave in a good manner during office hours.
- Shall use clear and respectful language, avoid using words and sentences having vague meaning.
- Shall adhere to the office dress code; casual attire is not permitted.
- Shall avoid unnecessary visits near women's workplaces and restrooms.
- Shall not stare at any colleague particularly female colleague. Staring is strictly prohibited and shall be considered as inappropriate behavior.
- Shall take approval from the departmental head for late hours working or working on holidays, more specifically female employee shall follow these instructions strictly.
- Shall understand that any action amounting to harassment of employees will result in serious disciplinary action.
- Shall promptly report any concerns to the Head of Human Resource, who will handle the complaints in accordance with terms of Policy on Protection Against Harassment at Workplace.