

## ANTI-HARASSMENT POLICY

### 1. Policy Statement

- 1.1. Kot Addu Power Company Limited (the “Company”) provides a working environment that ensures each and every employee is treated with respect and dignity. To achieve a dignified work environment, the Company encourages reporting of concerns of harassment, intimidation or abuse at workplace without fear of reprisal or victimization.
- 1.2. This Policy affirms Company’s zero tolerance for harassment. The Company is committed to encouraging a positive professional work atmosphere which is free from harassment and/or intimidation in accordance with the Protection Against Harassment of Women at the Workplace Act, 2010 (the “Act”).
- 1.3. This Policy has been framed subject to the provisions of the Act; and in case of any inconsistency between the terms of this Policy and the Act, the provisions of the Act shall prevail to the extent of the inconsistency.
- 1.4. The Board of Directors reserves the right to amend this Policy, from time to time, to ensure compliance with the provisions of the Act.
- 1.5. This Policy is applicable to all employees irrespective of gender.

### 2. What is “harassment”?

- 2.1. Harassment means any unwelcome sexual advance, request for sexual favours 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.

Three significant manifestations of harassment in the work environment are:

- Abuse of authority: A demand for sexual favours to keep or obtain certain job benefits, be it a wage increase, a promotion, training opportunity, a transfer or the job itself.
- Creating a hostile environment: Any unwelcome sexual advance, request for sexual favour(s) 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.
- Retaliation: This includes limiting the employee’s options for future promotions or training, distorting evaluation reports, or generating gossip against the employee.

2.2. False allegations made out of personal grudge or malicious intent will be treated as a serious disciplinary offence.

3. To whom does this Policy apply?

3.1. This Policy applies to all employees of the Company (Officers and Staff). Further, in keeping with the provisions of the Act, this Policy is also applicable to interns, apprentices and contractual employees whether employed on daily, weekly, or monthly or hourly basis. Page | 2

4. Inquiry Committee & Competent Authority

4.1. For the purposes of this Policy, upon occurrence of any incident of harassment, an Inquiry Committee shall be constituted of three members as follows:

- One member shall be from the Senior Management
- One members shall be from the CBA
- One member shall be a female employee

4.2. The Competent Authority shall be authorized to constitute the members of the Inquiry Committee and to designate the chairperson of the Inquiry Committee.

4.3. To avoid a conflict of interest, if a harassment instance involves a member of the Inquiry Committee, the Competent Authority shall re-constitute the Inquiry Committee.

4.4. If a harassment instance involves the Chief Executive, the HR Committee of the Board shall investigate the matter in accordance with this Policy.

4.5. For the purposes of this Policy, the Competent Authority shall mean the Chief Executive in case of a complaint in the Corporate Office, Lahore; and in case of a complaint at Kot Addu Plant, either of the Chief Executive or General Manager Engineering/ Plant Manager shall be the Competent Authority.

5. Complaints & Inquiries

5.1. To lodge a harassment complaint, a complainant may make a formal complaint through her/his incharge, supervisor, the Collective Bargaining Agent (CBA) or directly to a member of the Inquiry Committee. The Inquiry Committee member approached shall be obliged to initiate the process of inquiry. The supervisor shall facilitate the process and will be obliged not to cover up or obstruct the inquiry.

5.2. An inquiry will be conducted as speedily and sensitively as possible. An official written record will be maintained by the Inquiry Committee of each stage of the inquiry.



- 5.3. The Inquiry Committee will remain impartial in the process and keep the inquiry proceedings strictly confidential.
- 5.4. The Inquiry Committee, within three days of receipt of a written complaint shall:
- (a) communicate to the accused the charges and statement of allegations made against the accused (a formal written receipt shall be provided);
  - (b) require the accused within seven days from the date the charge is communicated to the accused to submit a written defense; and if the accused fails to so do without reasonable cause, the Inquiry Committee shall proceed ex-parte;
  - (c) enquire into the charge and may examine such oral or documentary evidence in support of the charge or in defense of the accused as the Inquiry Committee may consider necessary and each party shall be entitled to cross-examine the witness against her/him.
- 5.5. The Inquiry Committee shall comply with the following provisions during an inquiry:
- (a) statements and other evidences acquired in the inquiry process shall be treated as strictly confidential;
  - (b) instruct to treat the proceedings as confidential if it so desires;
  - (c) an officer may be nominated to provide assistance to each party, if considered necessary;
  - (d) the complainant and the accused shall have the right to be represented or accompanied by a CBA representative, a friend or a colleague;
  - (e) adverse action shall not be taken against the complainant or the witnesses;
  - (f) the Inquiry Committee shall ensure that the Company or the accused shall in no case create any hostile environment for the complainant so as to pressurize her from freely pursuing her complaint; and
  - (g) the Inquiry Committee shall give its findings in writing by recording reasons thereof.
- 5.6. The Inquiry Committee shall be empowered to:
- summon and enforce attendance of any person and examine him on oath;
  - require the discovery and production of any document;
  - receive evidence on affidavits;
  - record evidence;
  - get the complainant or the accused medically examined by authorized doctor, if deemed necessary;

- make recommendations to the Ombudsman for appropriate action against the complainant if the allegations leveled against the accused are found to be false and made with mala fide intentions.

## 6. Outcome of Inquiry

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6.1. The Inquiry Committee shall submit its findings and recommendations in writing to the Competent Authority within thirty (30) days from the initiation of the inquiry.

6.2. If the Inquiry Committee finds the accused guilty, it shall recommend to the Competent Authority for imposing one or more of the following penalties:

### (i) Minor penalties:

- censure;
- withholding, for a specific period, promotion or increment;
- stoppage, for a specific period, at an efficiency bar in the time-scale, otherwise than for unfitness to cross such bar; and
- recovery of the compensation payable to the complainant from pay or any other source of the accused.

### (ii) Major penalties:

- reduction to a lower post or time-scale, or to a lower stage in a time-scale;
- compulsory retirement;
- removal from service;
- dismissal from service; and
- Fine. A part of the fine can be used as compensation for the complainant.

6.3. The Competent Authority shall impose the penalty recommended by the Inquiry Committee within one week up upon the receipt of the Inquiry Committee's recommendation.

6.4. The Inquiry Committee shall meet on regular basis and monitor the situation regularly until it is satisfied that its recommendations subject to decision, if any of the Competent Authority and Appellate Authority have been implemented.

6.5. In case the complainant is in trauma, the Company will arrange for psycho-social counselling or medical treatment and for additional medical leave.

## 7. Appeal

7.1. Any party aggrieved by the decision of the Competent Authority may file an appeal before the Ombudsman in accordance with the provisions of the Act.

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