



***ANTI-HARASSMENT POLICY***

## **ANTI-HARASSMENT POLICY**

**Trust Securities and Brokerage Limited (TSBL)** is committed to provide a safe environment for all of its employees regardless of the gender from discrimination on any grounds and from sexual harassment. TSBL will have a zero-tolerance policy in relation to sexual harassment at the workplace while concluding all incidents or allegations reported of sexual harassment. Any person regardless of the gender reported to have sexually harassed another person will face disciplinary action upon found guilty which might extent to termination from employment. All complaints reported to the H.R department will be treated on high priority with respect and in confidence. The company assures that the complainant's name will kept confidential and will not be victimized in any form. As sexual harassment cannot be ruled out on gender, the policy is kept as gender neutral.

The company acknowledges that sexual harassment reflects power dynamics and frequently arises in unequal workplace relationships, such as those between a manager or supervisor and their employee, whether on-site or off-site. However, anyone, including the employees of TSBL, internees, vendors, customers or visitors who sexually harass another person at TSBL premises including the Branch Offices will be subjected to disciplinary and/or appropriate legal actions in accordance with this internal policy and applicable laws. Furthermore, the policy includes prohibition at social events, business trips, training sessions or conferences sponsored by TSBL.

### **Sexual Harassment:**

Whereas the word defines it all, sexual harassment is an unwelcomed conduct of sexual nature which makes a person feel offended, humiliated and/or intimidated. This may include where a person is asked for sexual favor which may result in continuation and/or promotion in employment as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. The actions constituting harassment may include physical, verbal and non-verbal including sending sexually explicit messages in writing, by phone, by email, by text, or through social media and/or by any other mean.

### **Procedure to File Complaint:**

The victim may choose to lodge and pursue a complaint formally or informally as she/he deems appropriate. The victim may approach his Manager/ Head of H.R/C.O.O or the inquiry committee members which have been constituted under this policy. When any of the above my receive an informal complaint, he/she will immediately record personally in his/her own records the dates, time and facts of the incident(s); record and evaluate to what outcome he/she wants; detail the victim on the procedure which will be followed; inform the complainant that the issue can be resolved impeccably while the process can still proceed to the committee; facilitate the discussion between both the parties; ensure that the complaint is to be resolved in three working days; ensure that he/she keeps a confidential record of what happens; follow up with the complainant to ensure that the unwanted behavior is stopped.

***The Inquiry committee comprising of the following members:***

1. Mr. Muhammad Shayan Ghayas (Director)
2. Mr. Muhammad Khurram Faraz (Manager Operations)
3. Ms. Zenobia Wasif (Chairperson)
4. Mr. Khizer Hayat Farooq (Director) as the Chairman of the H.R. & Remuneration Committee of the board, has been appointed by the board as the competent authority and Chairman of the committee.

***The inquiry committee shall:***

- Launch an investigation against the accused jointly or the chairman may assign the case to a sub-committee comprising of two members who will give the opportunity to the accused to defend him/her self against the charges
- The inquiry committee/sub-committee will inform the accused on the charges against him/her with a formal receipt obtained from him
- Require the accused to reply within seven days a defense on the charges against him/her
- The committee shall interview the victim and the alleged harasser separately
- The committee may call upon other third parties for further examination
- The accused and harasser may be given the opportunity to cross examine the third parties
- The committee may advise the accused/harasser to be suspended till the investigations are being completed
- Upon completion of the investigations, the incident needs to be documented in the committee minutes whether or not the incident of sexual harassment occurred.
- Provide the minutes and detailed report to the Head of HR as well as the CEO and COO of the company within thirty days.
- Upon receipt, the CEO may instruct the Head of H.R and remuneration committee who being the Chairman of the committee to what the penalty and/or punishment may be imposed on the accused.
- The chairman of the committee along with the CEO may impose the penalty and/or punished after a mutual discussion and understanding.
- The Head of H.R will be responsible to seek and liaise with the Legal Advisor of the company when any legal advice is required.
- In case the complaint is against any one of the committee member, the committee will be reinstated by the Board.
- In case the accused is the CEO, the board will advise the Chairman of the committee to give a hearing notice to the CEO which will be chaired by the committee along with the Board and hence a conclusion on the penalty or/and punishment to be accorded mutually if found guilty of any cause.