



WORKPLACE HARASSMENT POLICY

ASKARI LIFE ASSURANCE COMPANY
LIMITED

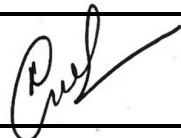
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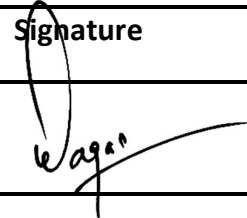
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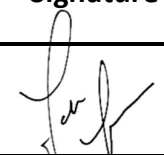
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Reviewed and recommended for the approval by **Ethics, Human Resource, Remuneration and Nomination Committee** on October 26th, 2023.

Approved by the Board of Directors in meeting held on October 27th, 2023.

WORKPLACE HARASSMENT POLICY

INTRODUCTION

The Management of Askari Life believes in and recognizes the “dignity of person”, a fundamental right enshrined in the Constitution of Pakistan. The Management is committed to providing a safe and conducive workplace environment to its workforce which is free of discrimination, hostility, intimidation, bullying, and all kind of harassment.

SCOPE

This policy is applicable to all staff of Askari Life Assurance Company Limited.

PURPOSE

To protect all persons particularly women against harassment at the workplace, the Government of Pakistan has promulgated and implemented “Protection against Harassment of Women at the Workplace Act (Act)” which is applicable to all public and private organizations. The Management of Askari Life is committed to ensure complete implementation of the said Act and subsequent amendments and/ or guidelines, as the case may be, in true letter and spirit. The Management undertakes the following measures for implementation of this Act:

1. Adoption of Code of Conduct prescribed by law in its entirety.
2. The Inquiry Committee, constituted under the Act, will immediately address the complaints of harassment as per law, as and when received.
3. Ensuring the justice is done swiftly and retaliation against the complaints is curbed.
4. Ensuring responsibility of the employer to ensure implementation of this Act.
5. Informing and educating the employees to make them more aware of the provisions of the Act, and to encourage a professional and dignified work environment for all persons particularly women, by eliminating and responding to all kind of harassment at the workplace.

HARASSMENT

Harassment means unwelcome conduct, stalking or cyber stalking whether verbal or physical, that is based on a characteristic protected by law. It includes, but is not limited to the display or circulation of written materials or pictures that are degrading to a person or group, and verbal abuse or insults about or directed at, or made in the presence of an individual or group or physical assault on the basis of gender, religion, caste, color, age, disability, ethnicity etc.

Sexual Harassment means any unwelcome sexual advance, request for sexual favors or other verbal, visual or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, including any gesture or expression conveying derogatory connotation 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.

Similarly, discrimination on the basis of gender, which may or may not be sexual in nature, but which may embody discriminatory and prejudicial mind-set or notion, resulting in discriminatory

behavior against the complainant. A single incident having the effect of making a person uncomfortable or creating a sense of fear or panic at the workplace is also harassment.

CONSTITUTION AND RESPONSIBILITIES OF THE INQUIRY COMMITTEE

An internal, independent Inquiry Committee (DAC) shall be constituted amongst the employees of the company who will review, inquire and decide all cases pertaining to harassment at the workplace based on the merit of the case(s).

The Committee shall consist of the following three members from Askari Life:

1. Mr. Atif Shamim Syed, Compliance Department – Chairman
(atif.shamim@askarilife.com)
2. Ms. Nazia Malik, Branch Operations Department – Member (nazia.malik@askarilife.com)
3. Mr. Muhammad Furqan, Distribution Services Department – Member
(muhammad.furqan@askarilife.com)

Based on the employment changes of the members of the committee, as the case may be, the management will announce the new member(s) and update their name(s) in the policy document. In case a complaint is made against one of the members of the Inquiry Committee, that member should be replaced by another for that particular case.

The Inquiry Committee shall have the power to regulate its own procedure for conducting inquiry and for fixing the place and time of its sitting and, where applicable, apply appropriate child-sensitive procedures. The statements and other evidences acquired in the inquiry process shall be considered as confidential.

The Inquiry Committee, within three days of receipt of a written complaint, shall

- communicate to the accused the charges and statement of allegations leveled against them
- require the accused within seven days from the day the charge is communicated to them to submit a written defense and on his failure to do so without reasonable cause, the Committee shall proceed ex-parte
- enquire into the charge and may examine such oral or documentary, audio, or video evidence in support of the charge or in defense of the accused as the Committee may consider necessary and each party shall be entitled to cross-examine the witnesses against them

The inquiry Committee shall ensure that the employer or accused shall in no case create any hostile environment for the complainant so as to pressurize them from freely pursuing their complaint.

The statements and other evidences acquired in the inquiry process shall be considered as confidential.

An officer in an organization, if considered necessary, may be nominated to provide advice and assistance to each party;

The Inquiry Committee shall give its findings in writing by recording reasons thereof and shall submit its recommendations to the company's Executive Committee (ExCo) within thirty days of

the initiation of inquiry. If the Inquiry Committee finds the accused to be guilty, it shall recommend to the company's Executive Committee for imposing penalties, as applicable.

Human Resources department through Executive Committee (ExCo) of Askari Life shall impose one or more of the penalties recommended by the Inquiry Committee, as applicable, within one week of the receipt of the recommendations of the Inquiry Committee.

The Inquiry Committee shall meet on regular basis and monitor the situation regularly until they are satisfied that their recommendations subject to decision have been implemented.

POWERS OF THE INQUIRY COMMITTEE

The Inquiry Committee shall have the power to inquire into the matters of harassment under this policy. The Inquiry Committee may demand and ensure attendance of any person potentially relevant to the inquiry. Similarly, it may demand any evidence or proof regarding the case or may ask for a medical examination of complainant or accused, as it may deem fit.

The Inquiry Committee may recommend to Ombudsperson for appropriate action against the complainant if allegations leveled against the accused found to be false and made with mala fide intentions.

The Inquiry Committee can instruct to treat the proceedings confidential.

COMPLAINTS PROCEDURE

(a) Informal Complaints Mechanism

If the complainant wishes to deal with the matter informally; they or any designated person by them may take up the complaint orally or in writing to their supervisor or a member of the Inquiry Committee, who may address the issue in the spirit of the policy, by;

- investigating the matter in a confidential matter
- giving an opportunity to the alleged harasser to respond to the complaint
- facilitate discussion and mediation between both parties to achieve an informal resolution which is acceptable to the complainant
- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped

If the incident or the case reported does constitute harassment of a higher degree and the designated person reviewing the case feels that it needs to be pursued formally for a disciplinary action, with the consent of the complainant, the case can be taken as a formal complaint.

(b) Formal Complaints Mechanism

If the complainant wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the complainant, the formal complaint mechanism should be used to resolve the matter.

The formal complaint can be forwarded to one of the designated persons of the Inquiry Committee in writing, who will investigate and resolve the case accordingly.

Assistance in the inquiry procedure can be sought from any member of the organization who should be contacted to assist in such a case.

APPEAL AGAINST DECISION AND/OR PENALTIES

Any party aggrieved by decision of the Executive Committee (ExCo) and/or on whom minor or major penalty is imposed may within thirty days of written communication of decision prefer an appeal to the Ombudsperson, appointed by the Government.

The Ombudsperson may, on consideration of the appeal and any other relevant material, confirm, set aside, vary or modify the decision within a period of ninety days in respect of which such appeal is made. It shall communicate the decision to both the parties and the employer.

CODE OF CONDUCT

It is expedient to have the Code of Conduct at the Workplace to provide protection and safety to persons against harassment. The Code provides a guideline for behavior of all employees, including management, and the owners of the organization to ensure a work environment free of harassment and intimidation. The same is furnished as under:

- i. The Code provides a guideline for behavior of all employees, including management, to ensure a work environment free of harassment and intimidation;

Harassment as described in the policy is unacceptable behavior in the organization and at the workplace, including in any interaction or situation that is linked to official work or official activity outside the office.

Explanation:

There are three significant manifestations of harassment in the work environment:

(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 wage increase, a promotion, training opportunity, a transfer or the job itself. It also includes degrading a person or group, verbal abuse, insults etc.

(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; or any discrimination on the basis of gender, which may or may not be sexual in nature, but which may embody a discriminatory and prejudicial mind-set or notion resulting

in discriminatory behavior on the basis of gender, religion, caste, color, age, disability, ethnicity etc.

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 or gender-based and/or any other kind of discrimination, a single offensive incident will constitute a violation.

(c) Retaliation

The refusal to grant a sexual favor or any unwelcome conduct which falls under the definition of harassment 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.

- ii. The employer shall do its best to temporarily make adjustments so that the accused and the complainant do not have to interact for official purposes during the investigation period. This would include temporarily changing the office, in case both sit in one office, or taking away any extra charge over and above their contract which may give one party excessive powers over the other's job conditions. The employer can also decide to send the accused on leave, or suspend the accused in accordance with the applicable procedures for dealing with the cases of misconduct, if required;
- iii. Retaliation from either party should be strictly monitored. During the process of the investigation work, evaluation, daily duties, reporting structure and any parallel inquiries initiated should be strictly monitored to avoid any retaliation from either side. Filing counter-blast suits for defamation etc. are also retaliation. The Ombudsperson or Inquiry Committee, as the case may be, should take notice of this in his or its proceedings.
- iv. It is strongly recommended that staff should report an offensive behavior immediately to someone they trust, even if they do not wish to make a formal complaint at the time. Although not reporting immediately shall not affect the merits of the case.

POLICY REVIEW/ MODIFICATION

Management can, at any time, review/rescind/modify the related policies and guidelines based on business need, and/ or regulatory requirement.

This policy is expressly predicated upon strict adherence to and alignment with the provisions of the Act. In the event of any modifications, amendments, or alterations to the Act subsequent to the formulation of this policy, such amendments shall be incorporated and conformed to within the confines of this policy.

Should a circumstance arise wherein this policy appears to conflict with the Act, it is unequivocally mandated that the Act shall supersede and take precedence over this policy to the extent of such conflict.