

Bolan Castings Limited

Anti-Harassment Policy

Protection against Harassment of Women and Men at the Workplace

1. Objective

BCL (the Company) strives to create and maintain a work environment in which people are treated with dignity, decency and respect and that should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees both female and male should be able to work and learn in a safe, yet stimulating atmosphere.

Through enforcement of this policy and by education of all employees, the Company will seek to prevent, correct and discipline behavior that violates this policy and unlawful discrimination or harassment of any kind will not be tolerated particularly in compliance with the Protection against Harassment of Women at the Workplace (Amendment) Act, 2022 and the SECP SRO 920(I) 2024 dated 12th June, 2024 regarding the amendment in Code of Corporate Governance Regulations, 2019.

2. Nature of Harassment

Harassment means;

- (i) Any unwelcome sexual advance, request for sexual favours, stalking or cyber stalking or other verbal, visual or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, including any gestures 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; or
- (ii) Discrimination on 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 basis of gender against the complainant; or
- (iii) Personal Harassment is any behavior that is found to be offensive to an individual or endangers an individual's job unnecessarily, and undermines the performance of that person; or
- (iv) Racial Harassment is a form of race discrimination which includes racial jokes, ethnic slurs, offensive or derogatory comments, or other verbal or physical conduct based on an individual's race or color. Such conduct may create an intimidating, hostile, or offensive working environment, or interfere with the individual's work performance.

3. Formation of an Anti-Harassment Inquiry Committee

Anti-harassment policy to safeguard the rights and well-being of employees, incorporating the mechanism as prescribed under the Protection Against Harassment of Women at the Workplace Act 2010 and the respective provincial laws on the protection against harassment of women and men at workplace, that require formation of an Inquiry Committee to enquire into complaints in this regard;

Anti-harassment Inquiry Committee would comprise of the following competent authorities:

1. Chairperson; (Could be a female Director)
2. Secretary / Member (Head of Admin & HR)
3. Other Members (Any two Departmental Head appointed by Chairperson of the committee)

4. Complaint procedure

BCL (the Company) has established the following procedure for lodging a complaint of harassment, discrimination or retaliation:

1. An individual who feels harassed, discriminated or retaliated may initiate the complaint process either verbally or by filing a “Complaint Form” in writing with BCL’s Human Resource (HR) Department or Designated Member of the Anti-Harassment Inquiry Committee.
2. Within the same working day of receiving the complaint, the HR will first notify to the HODs of both the person(s) “respondent(s)” and the “complainant(s)” and discuss verbally with all concerned and try to resolve the issue otherwise, initiate the investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred and the same should or should not be put formally to the Inquiry Committee.
3. Within three working days of the complaint being filed (or the matter being referred to the Anti-Harassment Inquiry Committee), the members of the committee or other person conducting the investigation will interview the complainant, the respondent and any witnesses and will conclude the investigation and submit a written report of his or her findings to the Concerned designated Authority.
4. The designated Authority and the BCL HR Department would discuss the findings with the management in case of executives, with the CBA in case of union staff and with the contractor in case of contract staff and thereafter will meet with the complainant and the respondent separately, notify them of the findings of the investigation, and inform them of the action being recommended.

5. The complainant and the respondent may submit statements to the designated authority / or member of the committee challenging the factual basis of the findings. Any such statement must be submitted no later than five working days after the meeting with the designated Authority of the Anti-harassment committee and the BCL HR Department in which the findings of the investigation are discussed.
6. The Anti-Harassment Inquiry Committee's decision will be in writing and will include the findings of fact and a statement for or against disciplinary action and would comprise of the followings:
 - a) Issue a first "Warning Notice" to the "respondent(s)" and observe his behavior with a stipulated time;
 - b) In case of the severity, frequency and pervasiveness of the conduct with the stipulated time issue a "Show Cause Notice" to the "respondent(s)" with the intimation that if his conduct will not improve with in further stipulated time, the "Final Warning Letter" be issued;
 - c) In case of repetition of misconduct and based on the quality of the evidence (e.g., first-hand knowledge, credible corroboration) the issue of "Final Warning Letter" to the "respondent(s)" with punishment either of "Forced Resignation" or "Termination" of the "respondent(s)" as per the BCL policy.

5. Code of Conduct

BCL has the following Code of Conduct to be followed by the all employees of the company and for the convenience copies of the Code of Conduct in English as well as in language(s) understood by the majority of employees be displayed at a conspicuous place:

1. During the discharge of official duties in the office, all functionaries should behave in proper manner according to the official decorum.
2. The language should be civilized and simple. Words and sentences having more than one meaning should be strictly avoided.
3. The dress should be proper as per office norms. Casual dress should not be worn.
4. All employees must strive to create and maintain a work environment in which people are treated with dignity, decency and respect and that should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees both female and male should be able to work and learn in a safe, yet stimulating atmosphere.
5. In case of women employees working together in the organization; the followings would be taken care of:

- a) Any other action which tantamount to harassment of female employees will be considered a serious offence and disciplinary action will be taken under the Code of Conduct against the offenders.
- b) Unnecessary stay and unnecessary visits to women's workplace and near women washrooms are strictly prohibited. Staring is also a menace in our society and should be avoided.
- c) Duties after office hours and duties on holidays for women should be avoided but in case of severe need must be approved from the concerned Head of Department.
- d) All female employees are advised to lodge a complaint immediately to the BCL's Human Resource (HR) Department or Designated Member of the Anti-Harassment Inquiry Committee.