

Anti-Sexual Harassment Policy

The Policy Statement

Pakistan Oxygen Limited (POL) is committed to provide a safe environment for all of its employees free from discrimination on any ground and from sexual harassment. POL will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another person will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence.

No one will be victimized for making such a complaint.

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser.

POL, therefore, recognizes that sexual harassment is gender neutral. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

POL recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships at the workplace and/or while on duty off site, for example, between manager or supervisor and employee. However, anyone, including employees of POL, job applicants, interns, trainees, third party employees, customers, contractors or visitors who sexually harasses another person at POL sites or at any other site related to POL business will be subjected to disciplinary and/or appropriate legal actions in accordance with this internal policy and applicable laws.

All sexual harassment is prohibited whether it takes place within POL premises or outside, including at social events, business trips, training sessions or conferences sponsored by POL.

Definition of Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked for sexual favor as a condition of that person's proposed and/or continued employment or promotion, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment that may be physical, verbal and non-verbal including sending sexually explicit messages in writing, by phone, by email, by text, through social media and/or by any other mean.

Complaint Procedure:

The Victim may choose to lodge and pursue a complaint formally or informally as she/he deems appropriate.

Informal Complaints Procedure:

Anyone who is subject to sexual harassment should, at her/his option, inform the alleged harasser that the conduct is unwanted and unwelcome. POL recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, she/he can approach:

- her/his Line Manager;
- Head of HR;
- any Functional Head and/or
- any member of the Inquiry Committee constituted under this policy.

When any one of the above receives an informal complaint, he/she will:

- immediately record personally in his/her own records the dates, times and facts of the incident(s);
- ascertain the views of the victim as to what outcome she/he wants;
- ensure that the victim understands the company's procedures for dealing with the complaint;
- inform the complainant that choosing to resolve the matter informally does not preclude the complainant from pursuing a formal complaint if she/he is not satisfied with the outcome;
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant;
- ensure that the above is done speedily and within three working days of the complaint being made.
- ensure that he/she keeps a confidential record of what happens;
- follow up in writing with the complainant (as per attached form) to ensure that the unwanted behaviour has stopped;

Formal Complaints Mechanism:

POL has formed an Inquiry Committee comprising of following Head and Members to deal with any formal complaints of Sexual Harassment. The Inquiry Committee comprises of:

- a) Mr. Mazhar Ali, Head of Business (Healthcare & MES) as Member and Head of the Inquiry Committee
- b) Ms. Joveria Chaudhry, Head of SHEQ (Safety, Health, Environment & Quality) as Member
- c) Mr. Babar Hussain Qazilbash, Business Development Manager as Member

The Chairman of the HR & Remuneration Committee of the Board has been appointed by the Board as the Competent Authority in accordance with applicable laws.

On receipt of a formal complaint by whatever means, the Inquiry Committee shall:

- launch an investigation against the accused jointly or the Head of the Committee may assign the case to a Sub-Committee comprising of one or two members who will afford the accused the opportunity to defend him/her self against the charges;
- the Inquiry Committee / Sub-Committee will:
 - communicate to the accused the charges and statement of allegation leveled against him, the formal receipt of which will be obtained from the accused;
 - require the accused within seven days from the day the charge is communicated to him/her to submit a written defense and on failure to do so without reasonable cause, the Committee shall proceed ex-parte;
 - interview the victim and the alleged harasser separately;
 - interview other relevant third parties separately;
 - 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 Committee may consider necessary and each party shall be entitled to cross-examine the witnesses against him;

- advise the Head of HR to have the accused suspended, if deemed appropriate by the Committee, from the duty till the investigations are completed;
- decide, on completion of the investigations, whether or not the incident(s) of sexual harassment took place;
- produce a report detailing the investigations, findings and reasons thereof and submit the same to the Head of HR and/or CEO in not more than thirty days;
- on receipt of the report of the Inquiry Committee, the CEO will recommend to the Chairman of the HR & Remuneration Committee (being the Competent Authority appointed in accordance with applicable law) as to what penalty and/or punishment may be imposed on the accused;
- the Competent Authority, in consultation with the CEO, will decide what penalty and/or punishment be imposed;
- the CEO will ensure to implement the decision and inform the Chairman of the Board HR & Remuneration Committee when the decision has been implemented.

The Head of HR will act as internal Counselor to the Inquiry Committee, to the CEO and to the Chairman HR & Remuneration Committee. The Head of HR will be responsible to seek and liaise with the Legal Advisor of the company when any legal advice is required.

In cases the complaint is against the CEO the complaint can be lodged with the Chairman of the HR & Remuneration Committee who will apprise the Board of the complaint. The Chairman of the Board on the advice of the Chairman HR & Remuneration Committee and after giving a personal hearing to the accused may recommend to the Board to decide the penalty and /or punishment. In case of removal from service the decision will be taken by at least 2/3 majority of the Board.

In case the complaint is against any member of the Inquiry Committee then such member will be replaced. When the complaint is against the Head of HR then he/she will be restrained from participating in all the processes related to the implementation of this policy.

Date:

Mr/Mrs

MY INFORMAL COMPLAINT OF SEXUAL HARASSMENT

Dear Sir/Madam

This refers to my recent informal complaint to you on the above subject against Mr/Mrs_____

I acknowledge and confirm that my complaint has been well attended and the issue has been resolved to my satisfaction.

With regards

Signature and Name of the Complainant