

SEXUAL HARASSMENT POLICY



Revision History

Date	Version	Version Description	Author
October 1, 2016	1.0	First Version	Amin Gulamani
January 1, 2020	1.1	Second Version	Amin Gulamani
October 31,2023	1.2	Third Version	Najwa Siddiqui

Objective:

It is the policy of UBL Fund Managers Ltd. that every person has the right to be treated with dignity and respect and to be free from all forms of harassment in the workplace. All forms of harassment are contrary to the high standards of conduct required of all officials under the Code of Conduct and may lead to disciplinary action. Staff members shall observe common courtesy and considerate behavior towards each other regardless of rank or contractual status.

All officials are expected to observe the highest possible standards of behavior, respecting the dignity and personal integrity of their colleagues. All staff members are expected to take responsibility for their own actions and to conduct themselves in accordance with this policy. The CEO and the Senior Management are responsible for providing and maintaining a harassment-free working environment. They should make every effort to prevent harassment from occurring, as well as to take effective and prompt protective measures once the CEO/Senior Management or a Supervisor becomes aware of the harassment, to ensure that behavior of this type ceases immediately.

Definition:

Sexual harassment at work is defined as any unwanted conduct of a sexual nature in the workplace or in connection with work, which, in the reasonable perception of the person concerned, is used as a basis for decision which affects that person's employment or professional situation, or creates an intimidating, hostile or humiliating work environment for that person. UBLFM shall handle Workplace Harassment according to the Protection against Harassment of Women Act 2010 and shall follow the procedure given in the act and impose punishments accordingly.

Audience:

The policy applies equally to all UBL Fund Managers Ltd. men and women. It covers all staff members (management and non-management cadre); including permanent and contractual staff, full time and part time, consultants, people seeking work with UBL Fund Managers Ltd., visitors and interns. It applies to the head offices (Corporate and Operations), regional offices including Investment Centers, UBL branches and also include the field. Social functions that are part of official business are also covered.

Company's Obligation:

The Company wishes to emphasize that all complaints of sexual harassment will be investigated seriously and that disciplinary sanctions will be applied, as appropriate. Any proven false and malicious or vexatious accusations of sexual harassment will be deemed to constitute a violation of the above standards of conduct and disciplinary sanctions will be applied, as appropriate.

Policy Details:

1. Sexual harassment at workplace or in connection with work constitutes unacceptable behavior that will not be tolerated either at the workplace or in the field. The Company places the highest priority on the prevention and elimination of sexual harassment in the workplace, bearing in mind that sexual harassment may be detrimental to an individual's physical and psychological well-being, lower morale and disrupt the working environment.
2. It is essential to emphasize that sexual harassment refers to conduct which is unwanted and unwelcome to the recipient. It is important that a person who believes that she or he is a victim of sexual harassment clearly communicates this (either directly or through a third party) to the staff member engaging in the unwanted and unwelcome behavior.

3. A staff member who believes that he or she has been or is being harassed, should write down the incident, as soon as possible, noting date(s), place(s), a short explanation of what happened and the names of any witnesses and /or of any third parties to whom the incident might have been mentioned and send the same to the Human Resources Department (HRD) or the CEO, as the case may be. The staff member may also discuss the incident with the Senior Management, as deemed appropriate.
4. The Company encourages staff members to attempt to resolve harassment-related issues through dialogue, as may be deemed appropriate by the staff member. Individuals are therefore encouraged to notify the presumed harasser that his or her behavior is unwelcome and unacceptable. Where the relative power or status of the persons involved or other considerations makes direct discussions difficult or inappropriate, the individual is nevertheless encouraged to seek dialogue and /or assistance from Senior Management as provided for in the procedures.

Composition of Committee:

To investigate any such incident, a committee comprising of Head of Human Resources, Head of Internal Audit and one senior management female staff is formed. The Committee shall be formed by the CEO. Assistance in the enquiry procedure may be sought from any member of the organization, if deemed necessary.

Disciplinary Sanctions:

Proven cases of sexual harassment will be subject to any one or more of the sanctions warning, reprimand, and termination as provided for in the Disciplinary Policy of the Company.

Please refer to the guidelines/annexures for the amendments made in the Protection Against Harassment of Women at the Workplace Act 2010.

Review: This policy is subject to review every 03 years by the Human Resources Department.