

### The Hub Power Company Limited

**Anti-Harassment Policy** 

# Approved by the Board on August 26, 2024

#### I. Introduction

HUBCO fosters a safe work environment by actively eliminating discrimination, bullying, harassment, and victimization within the organization. These negative behaviors can create a threatening and intimidating atmosphere that negatively impacts job performance, health, and employee well-being.

### II. Applicability

The Policy is applicable to all directors, officers and employees of the Company. Questions regarding this policy should be directed to Hubco's Company Secretary.

#### III. Policy

The fundamental principle underpinning this policy is that discrimination, bullying, harassment and victimization will not be tolerated. Any offender of such action leaves himself vulnerable to disciplinary action up to and including dismissal from service.

### IV. Purpose

To confirm the Company's commitment to eliminating all forms of discrimination, bullying, harassment, and victimization in the organization that can create a threatening and intimidating work environment and adversely affect job performance, health, and well-being of employees. The company has an established policy to facilitate employees in dealing with such matters.

## V. Guiding Principle

- The fundamental principle underpinning this policy is that discrimination, bullying, harassment, and victimization will not be tolerated. Any fender of such action leaves himself vulnerable to disciplinary action up to and including dismissal from service.
- All the proceedings of the harassment cases will be in the light of the Protection Against Harassment of Women at the Workplace Act 2010.
- Supervisors at all levels should take prompt action to stop discrimination, bullying, harassment, and victimization as soon as it is identified.
- All employees have a personal responsibility to treat other staff members, and those with whom they come in contact within the work environment.
- with dignity and respect and to ensure a comfortable work environment.
- In the event of a harassment incident, the victim holds the right to lodge a complaint, formally or informally, in either verbal or written form.
- An officer of the HR department, if deemed necessary, may be nominated to provide advice and assistance to each party.
- The complainant and the accused will have the right to be represented or accompanied by a friend or a colleague.
- All the inquiries will be carried via the Disciplinary Committee nominated by the LT, consisting of 3



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Members: Committee Chairperson Mrs. Faiza Kapadia (Company Secretary & GM Legal), Mr. Kaleem Khan (GM HR & CSR) and Mr. Ghulam Waqas Shahzad (Plant Manager – NBE Plant).

- In case a complaint is made against one of the members Disciplinary Committee, that member will not be a part of the Committee.
- The Disciplinary Committee will ensure that the accused does not create a hostile environment for the complainant as to pressure him/her from freely pursuing the complaint.
- The Disciplinary Committee is required to give all its findings in writing.
- All proceedings will be conducted in strict accordance with the Protection Against Harassment of Women at the Workplace Act 2010, including any amendments made to the Act over time. This ensures that all actions align with the most current legal standards and protections provided under the law. The company is committed to upholding these guidelines to maintain a safe and respectful work environment.
- The Disciplinary Committee will compile and submit its findings to the Leadership Team, which
  serves as the competent authority. The Leadership Team will thoroughly review the findings and
  is responsible for making the final decision. This process ensures that all disciplinary actions are
  evaluated at the highest level, promoting fairness and accountability within the organization.
- If a complaint is lodged against a member of the Disciplinary Committee, that member will be
  excluded from participating in the committee's proceedings. The Competent Authority will then
  have the discretion to appoint an alternate member to the committee for the purpose of
  maintaining impartiality and ensuring a fair review process. This replacement ensures that the
  investigation remains unbiased and is conducted with the highest standards of integrity.