

SEXUAL HARASSMENT POLICY

1.1. PURPOSE

The Sexual Harassment Policy aims to protect men and women in the company from unwanted sexual advances and give them guidelines to report incidents. This policy will also explain how TPL handles claims, punishes sexual harassment and helps victims recover.

TPL will not tolerate sexual harassment in the workplace in any shape or form. TPL culture is based on mutual respect and collaboration. Sexual harassment is a serious violation of those principles.

1.2. SCOPE

This policy applies to every person in our company regardless of gender, sexual orientation, level, function, seniority, status or other protected characteristics. All employees are obliged to comply with this policy.

TPL won't tolerate sexual harassment from inside or outside of the company. Employees, investors, contractors, customers and everyone interacting with the company are covered by the policy.

1.3. WHAT IS SEXUAL HARASSMENT?

Sexual harassment has many forms of variable seriousness. In addition to the definition provided a person sexually harasses someone when they:

- Insinuate, propose or demand sexual favours of any kind.
- Invade another person's personal space (e.g. inappropriate touching.)
- Stalk, intimidate, coerce or threaten another person to get them to engage in sexual acts.
- Send or display sexually explicit objects or messages.
- Comment on someone's looks, dress, sexuality or gender in a derogatory or objectifying manner or a manner that makes them uncomfortable.
- Make obscene comments, jokes or gestures that humiliate or offend someone.
- Pursue or flirt with another person persistently without the other person's willing participation.
- The most extreme form of sexual harassment is sexual assault.

1.4. RULES ON SEXUAL HARASSMENT

- **No one has the right to sexually harass the employees.** Any person in the company who is found guilty of serious harassment will be terminated. Also, if representatives of our contractors or vendors sexually harass TPL employees, TPL will demand that the company they work for takes disciplinary action and/or refuse to work with this person/company/vendor in the future.
- **Sexual harassment is never too minor to be dealt with.** Any kind of harassment can wear down employees and create a hostile workplace. TPL will hear every claim and punish offenders appropriately.
- **Sexual harassment is about how we make others feel.** Many do not consider behaviours like flirting or sexual comments to be sexual harassment, thinking they are too innocent to be labelled that way.

- But, if something you do makes your colleagues uncomfortable, or makes them feel unsafe, you must stop.
- **TPL assumes every sexual harassment claim is legitimate unless proven otherwise.** TPL listens to the victims of sexual harassment and always conduct its investigations properly. Occasional false reports do not undermine this principle.
- **TPL will not allow further victimization of harassed employees.** TPL will fully support employees who were sexually harassed and will not take any adverse action against them. For example, we will not move them to positions with worse pay or benefits or allow others to retaliate against them.
- **Those who support or overlook sexual harassment are as much at fault as offenders.** Managers/Supervisors and the Human Resource Department, especially are obliged to prevent sexual harassment and act when they have suspicions or receive reports. Letting this behaviour go on or encouraging it will bring about disciplinary action. Anyone who witnesses an incident of sexual harassment or has other kinds of proof should report to the Human Resources Department immediately.

1.5. HOW TO REPORT SEXUAL HARASSMENT

If you are being sexually harassed (or suspect another person is being harassed), please report it to the Human Resources Department or your line manager. TPL acknowledges it's often hard to come forward about these issues, but TPL needs your help to build a fair and safe workplace for all of its employees.

If you want to report sexual harassment within our company, there are three options:

- Ask for an urgent meeting with the Human Resources Department or your line manager. Once in the meeting, explain the situation in as much detail as possible. If you have any hard evidence (e.g. emails, messages or images), forward it or bring it with you to the meeting.
- Send your complaint via email. If you address it to your supervisor, please cc the Human Resources Department in the email and attach any evidence or information that can be used in the investigation. The Human Resources Department and your line manager will discuss the issue and contact you as soon as possible.
- Send you complaint via post. You can address the complaint to the Human Resources Department directly in a letter with attached printed evidence if any. The Human Resources Department will get in touch with you as soon as possible.

1.6. INADVERTENT HARASSMENT

Sometimes, people who harass others do not realize that their behaviour is wrong. TPL understands this is possible, but that doesn't make the perpetrator any less responsible for their actions.

If you suspect that someone doesn't realize their behaviour is sexual harassment under the definition of this policy, let them know and ask them to stop. Do so preferably via email so you can have records. Please do not use this approach when:

- Your manager, a line manager, investor or customer is the perpetrator.
- Sexual harassment goes beyond the boundaries of off-hand comments, flirting or jokes.

In the above cases, report to the Human Resources Department directly as soon as possible.

1.7. DISCIPLINARY ACTION AND REPEAT OFFENDERS

Employees who are found guilty of sexual assault will be terminated after the first complaint and investigation (during the investigation period the employee will remain suspended from their respective job).

Employees who are found guilty of sexual harassment (but not assault) the first time may:

- Be reprimanded and fined
- Get a “below expectations” performance review
- TPL may also transfer harassers to other department or locations.

Given both circumstances the decision regarding the termination of employment or penalty remains with sexual harassment committee. The decision taken by the committee will be final and cannot be challenged.

TPL shall apply these disciplinary actions uniformly. Employees of any sexual orientation or other protected characteristics will be penalized the same way for the same offenses.

1.8. HR RESPONSIBILITIES

The Human Resources Department and line managers should try to prevent sexual harassment by building a culture of respect and trust. But, when sexual harassment occurs and an employee makes a complaint, both Human Resources Department and managers must act immediately.

When the Human Resources Department receives a complaint that an employee harasses another employee, they will:

- Ask for as many details and information as possible from the employee making the complaint.
- Keep copies of the report with dates, times and details of incidents and any possible evidence in a confidential file. The Human Resources Department should update this file with all future actions and conversations regarding this complaint.
- Launch an investigation. If the matter is complex, the Human Resources Department can defer to a more Senior Manager/HOD, Sexual Harassment Committee or the Legal Department
- Inform the harassed employees of our company’s procedures and their options to take legal action if required.
- Contact the harasser and set up a meeting to explain the complaint and explicitly ask for this behaviour to stop, or,
- Arrange for mediation sessions with the two employees (harasser and perpetrator) to resolve the issue, if the harassed employee agrees or,
- Launch a disciplinary process depending on the severity of the harassment.
- In cases of sexual assault or coercing someone to sexual favours under threats, the company will terminate the harasser immediately after investigation.

1.9. **HELPING HARASSMENT VICTIMS**

Apart from investigating claims and punishing perpetrators, we want to support the victims of sexual harassment. If you experience trauma, stress or other symptoms because of harassment, consider:

- Taking a few days of leave to restore your mental health.
- Speaking to our Committee Members

1.10. **SPEAK UP, TPL LISTENS**

Sexual harassment can exhaust those who endure it. Speaking up about this issue is often tough for fear of not being heard, upsetting managers and challenging corporate culture.

Please don't let these fears deter you. TPL will do everything possible to stop sexual harassment and any other kind of harassment from happening, while supporting harassed employees. We need to know what's going on so we can act on it and by raising your voice on this issue, you help our company create a happy workplace and thrive.

1.11 **Committee**

In order to facilitate the employees and ensure the effectiveness of the policy the following committee has been formed. Any employee who wishes to file a harassment can reach out to any one of the committee members mentioned below:

| # | Name | Designation | Role |
|---|----------------------|---|-----------|
| 1 | Nader Nawaz | Group Head Human Resources & Admin | Secretary |
| 2 | Syed Ali Hasan Zaidi | Chief Strategy & Transformation Officer | Member |
| 3 | Aletta Fonseca | HR Business Partner | Member |
| 4 | Danish Qazi | Company Secretary & Group Counsel | Member |
| 5 | Shayan Mufti | AVP – Legal & Compliance | Member |

It is the responsibility of the committee members to ensure that the policy is effective and updated as and when required.

Management Rights:

The Management of the company has the right to revert, change, amend, nullify or cancel all or any parts of this policy without prior notice.

Approved by
Head of Human Resources & Administration

