

Atlas Battery Limited (ABL / Company) is committed to ensuring a safe, respectful, and harassment-free workplace for all its associates regardless of their gender, religion, sect, political affiliation and ethnicity. The policy outlines the procedures for preventing and addressing harassment, maintaining confidentiality and conducting fair investigations. It promotes a culture where every individual can work without fear of harassment or discrimination.

1. Purpose:

The purpose of this Anti-Harassment Policy is to ensure a safe, respectful, and inclusive workplace at all ABL locations by:

- 1.1 Protecting the dignity, rights, and well-being of all its associates.
- 1.2 Preventing and addressing all forms of workplace harassment, including the compliance of the **Protection against Harassment of Women at the Workplace Act, 2010**, and relevant provincial laws.
- 1.3 Establishing a transparent process for reporting, investigating, and resolving harassment complaints.

2. Scope:

The policy shall cover:

- 2.1 All associates, including regular / permanent, contractual, temporary, trainees, and interns.
- 2.2 Third parties such as vendors, consultants, contractors, clients, and anyone interacting with the Company associated.
- 2.3 Harassment which occurs at the workplace, during work-related activities, and in any form of work-related communication (in person, virtual, or written).

3. Authority / Responsibility:

The policy will be reviewed on a regular basis to ensure alignment with legal changes and best practices. Any amendments or updates shall be recommended by the Human Resource and Remuneration Committee (HRRC) to the Board of Directors for approval and the revised policy will be communicated to all concerned in the Company.

4. Definitions of Harassment:

Harassment is defined as any unwelcome verbal, written, or physical conduct that:

- 4.1 Is of a sexual nature or sexually demeaning, or
- 4.2 Creates an intimidating, hostile, or offensive work environment, or
- 4.3 Interferes with an individual's work performance or opportunities.
- 4.4 Examples of harassment include (but not limited to):
 - 4.4.1 Unwelcome sexual advances or requests for sexual favors.
 - 4.4.2 Offensive jokes, comments, or gestures based on gender, race, religion, ethnicity, or disability.
 - 4.4.3 Abuse of authority to coerce sexual favors in exchange for job-related benefits (e.g. promotions, raises, or retention).
 - 4.4.4 Retaliation against associates for reporting harassment or participating in an investigation.

5. Code of Conduct for Protection Against Harassment:

- 5.1 ABL must ensure adherence to the highest standards of professionalism and confidentiality as outlined in the Code of Conduct (Exhibit-A). The Code, which is also available in Urdu (Exhibit-B), mandates that the Company has to maintain a workplace free from harassment, where associates conduct themselves with integrity and mutual respect. Harassment in any form is strictly prohibited, and all reports of misconduct must be addressed promptly, with strict confidentiality to protect the privacy and rights of all parties. The Company ensures that

associates can report concerns without fear of retaliation, and any breaches of professionalism or confidentiality will lead to appropriate disciplinary measures.

6. Reporting Mechanism:

- 6.1 The CEO of ABL:
 - 6.1.1 has nominated General Manager Human Resource as Competent Authority, responsible for managing harassment complaints.
 - 6.1.2 will nominate Members of the Inquiry Committee.
- 6.2 The Competent Authority will be tasked with overseeing the reporting, investigation, and resolution of all harassment cases within the Company, ensuring compliance with the applicable legal requirements and Company policies.
- 6.3 Associates are encouraged to report harassment complaints either to the Competent Authority or to any member of the Inquiry Committee, which is specifically established to investigate harassment cases.
- 6.4 The reporting process must be transparent, accessible, and secure, ensuring all complaints are managed with strict confidentiality as guided by the protocols in **Section 4 of Exhibit-A**. No associate will face retaliation for reporting harassment or participating in an investigation.

7. Formation of Inquiry Committee:

- 7.1 An Inquiry Committee must be constituted in accordance with the **Protection Against Harassment of Women at the Workplace Act, 2010**, which should include:
 - 7.1.1 At least three members, including one female member
 - 7.1.2 Be tasked with conducting fair and impartial investigations.
 - 7.1.3 Ensure confidentiality of all parties involved.
 - 7.1.4 Submit findings and recommendations to the Competent Authority for appropriate action within thirty (30) days of the initiation of inquiry.
- 7.2 In case a complaint is made against one of the members of the Inquiry Committee, that member should be replaced by another for that case.

8. Investigation and Disciplinary Action:

- 8.1 Upon receiving a complaint, the Inquiry Committee will:
 - 8.1.1 Conduct a thorough investigation following legal procedures as stipulated in the said Act.
 - 8.1.2 Ensure all allegations are backed by evidence (e.g. witness testimony, documents, or circumstantial evidence).
 - 8.1.3 Submit the inquiry report to the Competent Authority who will recommend appropriate disciplinary action based on the findings, which may include, but not limited to the following:
 - (a) Written warnings.
 - (b) Suspension.
 - (c) Termination of employment.
 - (d) Legal action, where applicable.

Disciplinary actions will be proportional to the severity of the offense and will be aligned with both legal requirements and internal rules and policies.

- 8.2 In case the complainant is found guilty to have made false allegations maliciously or in bad faith, such action will be considered as a serious offence and the complainant would be liable to face strict disciplinary action.

9. Display and Awareness of Code of Conduct:

- 9.1 The Code of Conduct for Protection against Harassment must be prominently displayed in both English and Urdu in all workplaces and / or circulated to all Company associates ensuring accessibility for all associates (Ref: Exhibit A & B).
- 9.2 All associates are responsible for adhering to the Code of Conduct and reporting violations.

Exhibit-A

Atlas Battery Limited - Code of Conduct for Protection against Harassment

ABL is committed to fostering a respectful, safe, and harassment-free workplace. This Code of Conduct outlines the expected behavior of all associates and provides guidelines for reporting and addressing harassment, ensuring compliance with the **Protection against Harassment of Women at the Workplace Act, 2010**.

1. Professional Behavior

Every associate is expected to maintain the highest standards of integrity and professionalism. Harassment of any form, including unwelcome sexual advances, inappropriate comments, or hostile actions based on gender, race, or any other protected characteristic, will not be tolerated. ABL is dedicated to creating a workplace that upholds dignity and mutual respect in all interactions.

2. Respect and Equality

Associates are required to treat colleagues, clients, and partners with fairness and respect. Harassment, including sexual harassment, discriminatory comments, or conduct that creates a hostile or offensive work environment, is strictly prohibited. Harassment is defined as any unwelcome verbal or physical conduct that interferes with work performance or creates an intimidating environment.

3. Reporting Mechanism

The CEO ABL has nominated General Manager Human Resource as the Competent Authority to be responsible for managing harassment complaints. CEO will also form an Inquiry Committee on a case-to-case basis. Associates are encouraged to report incidents directly to the Competent Authority. The reporting process is designed to be transparent, accessible, and secure, ensuring that all complaints are handled with confidentiality.

4. Confidentiality and Non-Retaliation

All reports of harassment will be treated with the utmost confidentiality. The identities of complainants and respondents will be protected throughout the investigation process, and no associate will face retaliation for reporting an incident or participating in an investigation. Breaches of confidentiality or attempts at retaliation will result in disciplinary action.

5. Consequences of Violations

Any breach of this Code of Conduct, including acts of harassment, failure to report incidents, or breaches of confidentiality, will result in disciplinary action, which may include termination of employment and legal consequences where applicable.

Exhibit-B
(Urdu Translation)

اٹلس بیٹری کا ہراسگی کے خلاف ضابطہ اخلاق

اٹلس بیٹری ایک باعزت، محفوظ اور ہراسگی سے پاک کام کی جگہ کو فروغ دینے کے لیے پُر عزم ہے۔ یہ ضابطہ اخلاق تمام ملازمین سے وابستہ رویہ کی وضاحت کرتا ہے اور ہراسگی کی شکایات کی رپورٹنگ اور ان کے حل کے لیے رہنمائی فراہم کرتا ہے، جبکہ خواتین کے کام کی جگہ پر ہراسگی کے خلاف تحفظ کے ایکٹ، 2010 کی مکمل تعمیل کو یقینی بناتا ہے۔

1. پیشہ ورانہ رویہ

ہر ملازم سے توقع کی جاتی ہے کہ وہ دیانتداری اور پیشہ ورانہ مہارت کے اعلیٰ ترین معیار کو برقرار رکھے۔ کسی بھی قسم کی ہراسگی، بشمول ناپسندیدہ جنسی پیش قدمی، نامناسب تبصرے، یا صنف، نسل یا کسی دوسری خصوصیت کی بنیاد پر منفی رویہ کو برداشت نہیں کیا جائے گا۔ ہم ایک ایسی کام کی جگہ بنانے کے لیے پُر عزم ہیں جو عزت اور باہمی احترام کو فروغ دے۔

2. احترام اور مساوات

ملازمین کو ساتھی ملازمین، کلانٹس اور شراکت داروں کے ساتھ انصاف اور عزت کے ساتھ پیش آنے کی ضرورت ہے۔ ہراسگی، بشمول جنسی ہراسگی، امتیازی تبصرے یا ایسا رویہ جو کام کی جگہ کے ماحول کو مخالفانہ یا ناپسندیدہ بناتا ہو، سختی سے ممنوع ہے۔ ہراسگی کی تعریف ایسے کسی بھی ناپسندیدہ زبانی یا جسمانی رویہ کے طور پر کی جاتی ہے جو کارکردگی میں مداخلت کرتا ہے یا خوف و ہراس کا ماحول پیدا کرتا ہے۔

3. رپورٹنگ کا طریقہ کار

اٹلس بیٹری کے سی ای او، نے ایچ آر ڈیپارٹمنٹ کے جنرل مینیجر کو مجاز اتھارٹی کے طور پر مقرر کیا ہے جو ہراسگی کی شکایات سے نمٹنے کے ذمہ دار ہونگے، اس کے علاوہ سی ای او کیس کی بنیاد پر انکوئری کمیٹی کے ارکان بھی نامزد کریں گے ملازمین کو ترغیب دی جاتی ہے کہ وہ ایسے واقعات کو براہ راست متعلقہ افسر یا انکوئری کمیٹی کے کسی بھی رکن کو رپورٹ کریں۔ رپورٹنگ کا عمل شفاف، قابل رسائی اور محفوظ ہونا چاہیے، تاکہ تمام شکایات کو رازداری کے ساتھ سنبھالا جائے۔

4. رازداری اور عدم انتقامی کاروائی

ہراسگی کی تمام شکایات کو انتہائی رازداری کے ساتھ نمٹایا جائے گا۔ شکایت کرنے والے اور جوابدہ کی شناخت کو تفتیش کے پورے عمل کے دوران محفوظ رکھا جائے گا اور کسی بھی ملازم کو شکایت درج کرنے یا تفتیش میں حصہ لینے پر انتقامی کاروائی کا سامنا نہیں کرنا پڑے گا۔ رازداری کی خلاف ورزی یا انتقامی کاروائی کی کوششوں کے نتیجے میں تادیبی/ڈسپلنری کاروائی کی جائے گی۔

5. خلاف ورزی کے نتائج

اس ضابطہ اخلاق کی کسی بھی صورت میں خلاف ورزی، بشمول ہراسگی کے واقعات، شکایات کی عدم رپورٹنگ یا رازداری کی خلاف ورزی کے نتیجے میں تادیبی/ڈسپلنری کاروائی کی جائے گی، جس میں ملازمت سے برطرفی اور قانونی کاروائی شامل ہو سکتی ہے۔

This policy is effective from February 25, 2025.

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