

Harassment Policy

Bata Pakistan Limited

Objective:

Bata Pakistan Limited (hereinafter referred to as "Company" or "Bata Pakistan") is committed to provide the work environment free from harassment of any kind whatsoever. We respect dignity of everyone involved at our work place, including our employees, suppliers and customers. We require all employees to make sure, that they maintain mutual respect and positive attitude towards one another.

Definition of Harassment

Harassment is "a course of conduct directed at a specific person that causes substantial emotional distress in such person. The term is used in a variety of legal contexts to describe words, gestures and actions which tend to annoy, alarm and abuse another person; e.g., the use of "obscene or profane language or language the natural consequence of which is to abuse the hearer or reader" is unlawful harassment."

A person commits a petty misdemeanor if, with purpose to harass another, (1) verbally or make telephone call without purpose of legitimate communication; or (2) insults, taunts or challenges another in a manner likely to provoke violent or disorderly response; or (3) makes repeated communications anonymously or at extremely inconvenient hours, or in offensively coarse language; or (4) subjects another to an offensive touching; or (5) engages in any other course of alarming conduct serving no legitimate purpose of the actor. The more common types of harassment are:

- i. Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.

- ii. Verbal forms of harassment include unwelcome innuendoes, suggestions and hints, physical advances, comments which overtones, objectionable jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- iii. Any other unwelcome physical, verbal or non-verbal conduct of rude nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- iv. Non-verbal forms of harassment include unwelcome gestures, indecent exposure, and the unwelcome display of explicit pictures and objects in any media.
- v. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of harassment, as defined above, may amount to harassment:-
 - a) Implied or explicit promise of preferential treatment at work; or
 - b) Implied or explicit threat of detrimental treatment at work; or
 - c) Implied or explicit threat about present or future employment status; or
 - d) Interference with work or creation of an intimidating offensive work environment; or
 - e) Humiliating treatment likely to affect health, safety or self-esteem.

Policy Statement

- i. All Bata Pakistan employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- ii. All Bata Pakistan employees will understand and appreciate the rights of the individual to be treated with dignity.
- iii. All Bata Pakistan employees are required to maintain a work environment, which is free from any kind of harassment.
- iv. Bata Pakistan employees will refrain from committing any acts of harassment at work place.
- v. Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- vi. Bata Pakistan employees will be protected against victimization, retaliation for filing or reporting a complaint on harassment and will also be protected from false accusations.

Procedure for dealing with Complaints of Harassment

- i. If the person believes that he/she has been subjected to harassment, then the complaint/grievance should be promptly reported to the Internal Complaints Committee (ICC) through the respective Department Head unless that head himself/herself is subject to complaint.
- ii. Ideally, the complaint should be lodged immediately or within a reasonable period of 1 month from the date of incident/last incident.

- iii. All complaints/grievances of harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. There may be a need to nominate a senior person to head the investigation especially in the distributed offices of Bata Pakistan outside Lahore location.
- iv. An “Internal Complaint Committee” will be set up to deal with the complaint.
- v. The complaint committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- vi. Any victimization of, or retaliation against, the complainant or any Bata Pakistan employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.
- vii. In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the ICC post investigations may recommend disciplinary action against the complainant.
- vii. A type of employment discrimination, includes undesirable advances, requests for undue favours, and other verbal or physical conduct of a nature prohibited under the Law, and/or this policy.

Disciplinary Action

In case any such conduct amounts to a specific offence under any law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.

Harassment will not be tolerated at Bata Pakistan. If the outcome of an investigation by the Internal Complaints Committee shows that harassing behaviour has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

Internal Complaint Committee

The committee will be chaired by HR Director and shall include at least two senior Departmental Heads, preferably including one female executive.

The Internal Complaint Committee may constitute sub-committees for places where factories and regional offices of the Company are located. The ICC would examine each case and take a decision from time to time, for conducting the enquiry proceedings.

Confidentiality

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the Company shall not be published, communicated or made known to the other staff, public, press and media in any manner. All complaints/grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

Director HR

Managing Director