



# Harassment Policy

Initial Issue Date: 12-04-23	Document No. DAS-TRG-POL-04
Revision Date: 13-11-23	Revision No. 01

## **The Policy**

The DAS is committed to a workplace free of harassment or bullying based on sex, age, caste, ethnic background, religious beliefs, sect, disability, medical condition, marital status caring and job responsibilities. The Policy caters equally for men, women and transgender and provides all employees, who are the affected by harassment or bullying, with a means of redress. Any employee who is found to be harassing or bullying those covered under the Policy will face disciplinary action including termination.

## **Scope**

The Policy covers all employees, including senior management, Board of Directors (BoD), Members of the Impartiality Committee, vendors, consultants, interns, clients with whom the organization has any dealings. The Policy focuses on harassment and bullying experienced at the workplace and facilitates the creation of the organizational culture that is free of harassment, bullying, intimidation and abuse.

## **Harassing Behaviors**

DAS strictly prohibits any harassing behavior, such as:

### **Personal Harassment**

Any behavior including in-person communication, telephone calls, voice messages, text messages, email messages, social networking site postings, instant messages, postings of pictures or information on websites, written letters, gifts, ordering goods or services, or any other communications that are undesired and/or place another person in fear, and undermines the performance of that person.

### **Ethnic/Religious Harassment**

A form of discrimination which includes ethnic jokes, religious slurs, comments on one's sect, offensive or derogatory comments, or other verbal or physical conduct based on an individual's ethnicity, religion, sect, or place of origin. Such conduct may create an intimidating, hostile, or offensive working environment, or interfere with the individual's work performance.

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## **Sexual Harassment**

Any unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature and any unwanted comments, sexist statements, slurs, jokes, sexist graffiti and literature including articles, pictures and posters It can be either on a onetime basis or in a continuous series of incidents, however minor.

Sexual harassment is coercive and one-sided. Both men and women can be affected. (Please refer to Code of Conduct on Sexual Harassment at workplace under Harassment Act of Pakistan. )

## **Bullying**

Bullying is unwanted, aggressive behavior that involves a real or perceived power imbalance. Bullying can happen by managers towards workers, among co-workers, by workers towards managers. It can be verbal or in writing, or online. This includes saying or writing mean things, such as, name-calling, inappropriate comments, taunting, threatening to cause harm; social includes hurting someone's reputation or relationships, leaving someone out on purpose, spreading rumors about someone, embarrassing publically.

## **Roles and Responsibilities**

### **The Employee**

Any employee who believes to be subjected to any form of harassment/bullying, or who witnesses others being subjected to such harassment or bullying is encouraged to promptly report the incident(s) to either General Manager or the Director or directly to the Chief Executive Officer (CEO). All employees are expected to cooperate with investigations undertaken and failure to cooperate in an investigation will result in disciplinary action, including termination.

All supervisors must make every effort to maintain a work environment that is free from any form of harassment or bullying. Supervisors are expected to take all allegations of harassment or bullying, including sexual harassment, seriously, and to immediately refer the matter to the any member of management team as above.



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## **Complaint/Grievance Settlement Process**

In order to address complaints related to harassment and bullying at workplace, DAS will also follow the guidelines provided by Anti Sexual Harassment Act 2010. In case the sexual harassment complaint is received against any DAS staff, the CEO will initiate

### **Informal Procedure**

An informal approach to resolve a complaint of harassment will be through mediation between the parties involved and by providing advice and counseling on a strictly confidential basis. It is complainant discretion to take a complaint the informal channel. The complainant can launch a formal complaint at any time.

### **Formal Inquiry Procedure**

The process of investigation and recommendation must not exceed ten (10) working days after the registration of the complaint. Appeal for review of the IC's decision could be sent to the CEO (if, not the complainant or alleged bully, harasser) who is bound to respond within a period of five (05) working days. All investigations of harassment or bullying claims will be conducted in a way that respects, to the extent possible, the privacy of all the persons involved is ensured. Investigations will be conducted in a prompt, thorough and impartial manner. The report of the investigation will be forwarded to the CEO. The CEO to make a final decision as to whether a violation of the policy has been substantiated. Where harassment is found to have occurred, prompt and appropriate remedial action, to stop the harassment or bullying and deter its reoccurrence, will be taken.

The remedial action taken will include counseling, training, intervention, mediation, and/or the initiation of disciplinary action including termination of employment. The Manager HR will maintain a written record of the harassment or bullying complaints received. The records will be maintained as confidential records to the extent practicable and appropriate.

### **False Accusations and Information**

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If any employee knowingly makes a false accusation of unlawful discrimination/ harassment or knowingly provides false information in the course of an investigation of a complaint will be dealt with breach of conduct and be grounded for strict disciplinary action. However, complaints made in good faith, even if found to be unsubstantiated, will not be considered as a false accusation.

## **Confidentiality**

All complaints and investigations will be handled, to the extent possible, in a manner that will protect the privacy and interests of those involved. To the extent practical and appropriate under the circumstances, confidentiality will be maintained throughout the investigation process. In the course of an investigation it may be necessary to discuss the claims with the alleged harasser and other persons who may have relevant knowledge. It, therefore, may be necessary to disclose information to persons with a legitimate need to know about the matter, prior consent of the complainant will be acquired. All persons interviewed will be directed not to discuss any aspect of the investigation with others in light of the important privacy interests of all concerned. Failure to comply with this confidentiality directive may result in disciplinary action.

## **Disciplinary Action**

Any employee, as a result of an enquiry report, found to have violated the policy might be subject to appropriate disciplinary action, which may include; suspension, relocation, demotion, confiscation of promotion, service, or increment(s), reassignment, or termination of employment decided by the CEO.



**Approved By, CEO**  
**13<sup>th</sup> Nov, 2023**