

<b>JKSML</b>	<b>JK Sugar Mills (Pvt.) Limited.</b>	<small>DOC# JKSML/Policies/HR/005 Revision: 01 Effective Date: May 19, 2026</small>
	<i>Anti Harrasment Policy</i>	

**Purpose**

The purpose of this policy is to maintain a workplace which is free from all forms of harassment.

**Policy Statement**

JK Sugar Mills (Pvt) Limited aims to ensure zero tolerance for any form of harassment based on race, color, religion, gender, national origin, age, disability (mental or physical). Moreover, no retaliation shall be tolerated against any employee(s) for reporting harassment and / or for assisting in any inquiry about such an incident.

**Scope**

This policy apply to all employees of JK Sugar Mills (Pvt) Limited and workers of their registered cane supplying farms.

**Definitions**

**Harassment** - An unwelcomed or unreciprocated behavior which makes an employee feels intimidated, offended, or belittled. It can take place between:

- Employees (at any level / grade)
- Employee and another person in the workplace (e.g. guest, relatives, visitors etc.)

**Harasser** (in perspective of this policy, potential harasser) - Someone who harasses (irritates or torments someone).

**Harasee** (in perspective of this policy, potential harasee) - Someone who is being harassed (is irritated or tormented by someone else).

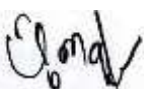
**Examples of Harassment**

Following behaviors can be examples of harassment:

- Jokes, derogatory or dismissive comments
- Circulating (includes social media), displaying written or pictorial material that is offensive or belittling
- Persistent following (stalking)
- Verbal abuse or threat
- Gestures that are insulting or belittling
- Disrupting an individual’s work, work space, equipment or interfering with his / her personal / professional property
- Persistent Staring / Suggestive looks implying an interest
- Physical Harassment

**Terms & Conditions**

1. The Company shall do its utmost to treat employees fairly and equitably in an environment free of bullying and harassment and shall ensure all staff is treated on merit by their managers, peers and all other staff members.
2. Appropriate action shall be taken against anyone who is found to harass another employee. Depending on the severity of the action, consequences may include, warning (written / verbal), transfer, suspension, demotion, dismissal and/or initiation of legal proceeding.



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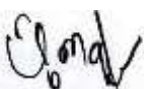
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3. Every effort shall be made to deal with the matter expeditiously and an action for an offence be taken within 15 days from the date on which the offence was officially reported.
4. Counseling sessions shall be arranged by respective HRD, where applicable.
5. Any offence occurring within 6 months from the occurrence of a previous similar offence shall be regarded as consecutive to it and shall be treated accordingly.
6. Employee(s) shall be notified in writing of the penalty being applied as well as the penalty he / she is liable to receive in the event of further infractions.
7. Retaliation against any employee for making a good faith complaint under this policy or for assisting in a complaint investigation shall not be tolerated. However, if, after investigating any complaint of harassment, it is proved that an employee has provided false information regarding the complaint, disciplinary action up to and including termination may be taken against the individual who made the complaint or who gave the false information.
8. Action taken on the basis of the code does not prevent employees being prosecuted in accordance with the local laws, if applicable.
9. A grievance mechanism for employees is in place to present a grievance about abuse, violence and harassment records and details of grievances are kept in a confidential manner.
10. Whistle-blowers are protected and their anonymity guaranteed
11. JK Sugar Mills (Pvt) Limited undertake awareness-raising campaigns.

**Procedure for disciplinary action**

1. Respective HR or inquiry officer appointed by the management/ Farm owner, shall investigate the offence and discuss it first, with the Harasee and then the Harasser and shall note their comments separately for the purpose of preparing a report with complete details.
2. Based on the outcome of the investigation, respective HR/ Farm owner in consultation with the concerned authorities may take one of the following actions:
  - Verbal Warning
  - Issue a Warning Letter; and/or
  - Issue a transfer Letter; and/or
  - Issue a Suspension Letter; and/or
  - Issue a Termination Letter
3. In case the offence relates to physical harassment by any staff member, respective HR/ Farm owner shall investigate the matter as soon as possible and if both employees (Harasser & Harasee) are in the same department then one of them may be temporarily moved in some other department of same and / or other office till the matter is resolved.
4. The final approval of the action proposed shall be subjected to the approval of respective management and / or BOD.
5. On receipt of the approval, respective HRD/ Farm owner shall hand over the warning, transfer, suspension or termination letter to the employee who shall acknowledge receipt of the same by signing the letter.



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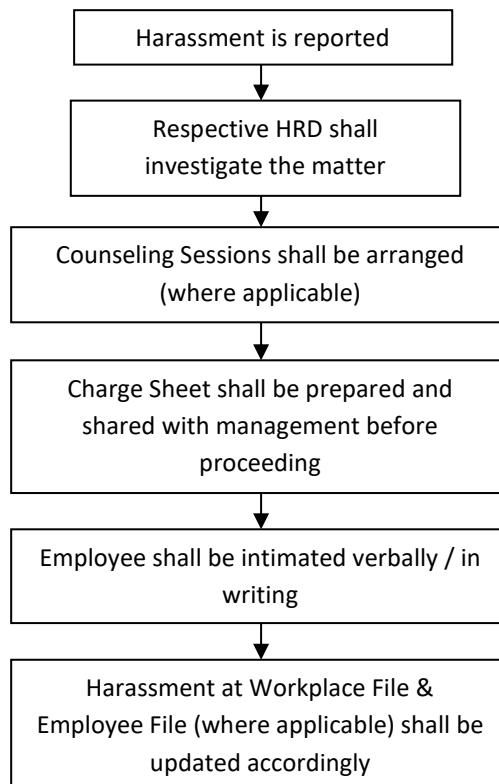
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- A copy of letter shall be attached with report and shall be placed in Harassment at Workplace File while another copy shall be filed in the employee's personal file.

**ANNEXURE A**

**Transfer Procedure**



**Responsibilities**

**Employees**

- To maintain a courteous manner under which impolite language in any form would be unacceptable.
- Must not engage in harassing conduct.
- Employees subjected to harassment should immediately report the matter as per the procedure described in this policy to bring it to the attention of respective personnel.
- In addition, employees who observe or are made aware of possible harassment in the workplace have an obligation to immediately report the incident to their HOD/respective HR.

**Immediate Supervisor / HOD & Respective Management**

- Supervisors / HOD's and respective management officials must act promptly to resolve the matter in coordination with respective HR.

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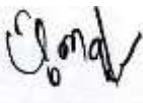
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**HRD**

1. Respective HRD shall keep all information confidential to the greatest extent possible.
2. Ensure that investigation shall remain unbiased and all charges must be documented on individual case sheet accordingly. Proper action as per implemented policy shall be taken.

**REVIEW**

This policy will be reviewed once within three years, or as required, in order to ensure that the terms are current, fair and representative of relevant corporate and industry laws. The Company reserves the right to change this policy at any time, without prior notice.



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