

Prohibition of Sexual Harassment Policy

Purpose

The purpose of the Prohibition of Sexual Harassment Policy is to protect the personnel (employees and direct contractors) of Navana Group (including its business units and profit centers) from unwanted sexual advances, give them guidelines to report incidents and help the Group implement a safe and healthy work environment.

Commitment

Navana Group is committed to providing a safe work environment for all its personnel free from sexual harassment. The Group will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all reported incidents seriously and promptly investigate all allegations of sexual harassment. Any personnel found to have sexually harassed another will face disciplinary action leading up to termination from employment.

No personnel can be subjected to retaliation as a result of filing a sexual harassment complaint or participating in a sexual harassment investigation, proceeding or hearing conducted by the Company. Retaliation under these circumstances is also a clear violation of the Prohibition of Sexual Harassment Policy.

Scope

The Prohibition of Sexual Harassment Policy applies to all personnel in Navana Group (including its business units and profit centers) regardless of gender, sexual orientation, hierarchy, function, seniority, status, relations with the senior management, high performance, business criticality etc. All personnel of Navana Group are required to comply with this policy. Employees, contractors, investors, third party contractors, customers and everyone interacting with Navana Group or its business units and profit centers are covered by this policy. This means that the policy obliges Navana Group to handle sexual harassment complaints even if the concerns are reported by investors, third party contractors, customers or any other stakeholders against its personnel.

Sexual Harassment

Sexual harassment includes unwelcome sexual advances or requests for sexual favors where, (1) submission to such conduct is an explicit or implicit condition of employment, (2) submission to or rejection of such conduct is a basis for employment decision and, (3) such conduct interferes with work performance or creates an intimidating, hostile or offensive work environment. Sexual harassment may be perpetrated by the members of the same sex and is not limited to conduct based on sexual desire.

Sexual harassment can take many forms including verbal, visual and physical. Sexual harassment includes but is not limited to the following examples of harassing activities: verbal conduct or abuse such as epithets, slurs, offensive jokes, name calling or bullying; derogatory, suggestive or unwanted comments or statements describing an individual; remarks about sexual activities; suggestive or obscene letters, emails, notes or invitations; visual conduct such as displaying or distributing objectionable items, offensive cartoon, photographs, electronic images, calendars, posters or similar written or graphic items at company facilities or using Company equipment; leering or making sexual gestures; physical conduct such as assault, inappropriate touching, impeding or blocking movements, brushing against the body or other inappropriate physical contact directed at a personnel; sexual conduct such as unwanted sexual advances or innuendoes; offering employment benefits or preferential treatment in exchange for sexual favors; direct or indirect pressure for sexual activity, or actual or threatened retaliation for turning down sexual advances.

According to the guideline of the High Court Division of the Supreme Court of Bangladesh, sexual harassment involves disturbing women and children through letters, emails, text messages, posters, writings on walls, benches, chairs, tables, notice boards and threatening or pressing them to make sexual relations. Rape, sexual provocation, envious or intentional propaganda against women and children and showing such films, digital

images, paintings, cartoon, leaflets, posters and still photographs are also considered as indirect forms of sexual harassment. The guideline of the High Court Division of the Supreme Court of Bangladesh prohibits anybody from touching or hurting with bad intention any part of the body of a girl or woman. The guideline also prohibits indecent word or comment used against them or that any unknown adult girl or woman be addressed as a beautiful one with any bad intention. Teasing women and children through email or telephone will also be considered as offence and any kind of provocation or character assassination will have to be stopped.

Complaint Procedure

If a personnel of Navana Group (including its business units and profit centers) is aware of or feels that s/he has been subjected to sexual harassment, s/he can immediately report the concerns to her/his direct supervisor. If the personnel is uncomfortable with doing so, s/he can report the concerns to the next level of management, the HR Business Partner or the Chief of Human Resources. All complaints will be handled confidentially to the extent possible. Complaints will be promptly and effectively investigated, with prompt and effective corrective action for substantiated allegations. Navana Group advises that the Company's internal complaint procedure be followed first to hopefully resolve allegations of sexual harassment. All personnel are, however, within their rights to report sexual harassment concerns to the country's concerned authorities.

According to the guideline of the High Court Division of the Supreme Court of Bangladesh, sexual harassment complaints within an organization is handled by a 5 members harassment complaint committee. The committee is headed by a woman at every workplace to investigate allegations. The guideline also prescribes that the majority members of the committee are women.

Governance

The Prohibition of Sexual Harassment Policy will be typically reviewed every 24 months or earlier as required by the law, changes in legal guidelines, changing circumstances in the organization or changes in the complaint procedure.

Reviewed on	9 June 2021 (Vetted by Legal)
Next Review on	June 2023
Approved on	9 June 2021
Approved by	Wahed Azizur Rahman, Group CEO

Interdependencies

- Navana Anti-Discrimination Policy
 - Navana Anti-Harassment and Threat of Violence Policy
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