

## Anti-Harassment and Threat of Violence Policy

### Purpose

The purpose of the Anti-Harassment and Threat of Violence (TOV) policy is to assure a safe workplace and reduce the risk of violence including, but not limited to abuse, bullying, harassment or threats arising in connection to work. The policy is used to outline the procedures for individuals to report and seek mitigation of violence that they may have been subjected to.

### Commitment

Navana Group including its business units (BUs) and profit centers (PCs) is committed to ensuring a safe environment for all individuals in the facilities of the organization. Navana Group does not tolerate any type of workplace violence committed by or against its personnel or individuals within its premises. All individuals within the facilities of Navana Group are prohibited from making threats or engaging in acts of violence.

### Scope

The Anti-Harassment and TOV policy applies to all personnel (employees and direct contractors), third party contractors, visitors, customers and other stakeholders. This means the policy will be enforced by all legal means available to the organization on the above-mentioned individuals in the event of an incident of violence or TOV. Acts of harassment, violence or TOV include but is not limited to the following:

- Causing physical injury to another individual
- Making threatening remarks
- Displaying hostile behavior that creates a reasonable fear of injury or emotional distress
- Intentionally damaging employer's property or property of another individual
- Possessing an unauthorized weapon while in the facilities of the organization
- Committing acts motivated by or related to sexual harassment

### Procedure for Complaint

Anyone inside the facilities of Navana Group who has been subjected to harassment or TOV should report the matter immediately to Human Resources. It is also the responsibility of all personnel in Navana Group to report acts of violence that they have witnessed immediately to Human Resources. It is also expected that the security personnel witnessing the acts of violence will intervene where it is reasonable and safe to do so in order to stop the violence from escalating. Navana Group reserves the right to report acts of violence to the legal authorities and engage the law enforcement agencies, if required, to intervene and stop acts of violence inside its facilities.

### Violation of Anti-Harassment and TOV Policy

Navana Group is committed to a workplace free of harassment and violence. Failure to comply with the policy may subject the personnel to disciplinary actions leading up to termination from employment. Failure to comply with the policy by other parties including visitors, customers, suppliers and other stakeholders may subject them to rights of admission being temporarily or permanently refused, termination of contracts, leading up to engagement of the law enforcement agencies and appropriate legal actions.

**Governance**

The anti-harassment and TOV policy will be typically reviewed every 24 months or earlier as required by 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**

Prohibition of Sexual Harassment Policy

---