

HABIB INSURANCE COMPANY LIMITED



# Sustainability, DE&I and Anti-Harassment Policy

‘Sustainability’, ‘Diversity, Equity and Inclusion’ and ‘Anti-Harassment’

PREPARED BY:  
COMPLIANCE DEPARTMENT

## ‘Sustainability’, ‘Diversity, Equity and Inclusion (DE&I)’ and ‘Anti-Harassment’

### 1. Policy Scope

Habib Insurance Company Limited (HICL) ‘Sustainability’, ‘Diversity, Equity and Inclusion (DE&I)’ and ‘Anti-Harassment’ policy (referred to as "the Policy") applies to all business operations of HICL.

### 2. Policy Statement and Objectives

In alignment with the amendments made by the Securities and Exchange Commission of Pakistan (SECP) under the Listed Companies (Code of Corporate Governance) Regulations, 2019, this policy on ‘Sustainability,’ ‘Diversity, Equity and Inclusion (DE&I),’ and ‘Anti-Harassment’ is formulated in accordance with Regulation 10, sub-regulation (4), clause (xvi), and Regulation 10A, which emphasize the board’s role in addressing sustainability risks and opportunities, promoting DE&I, and ensuring a workplace free from harassment.

Our policy aims to create an environment where sustainability is integrated into our core operations, DE&I principles are actively promoted, and a zero-tolerance approach to harassment is maintained. By adhering to this policy, we strive to safeguard the rights and well-being of our employees, foster an inclusive and equitable workplace, and enhance the long-term value of our company.

### 3. Sustainability

#### Objective

Habib Insurance Company Limited (HICL) recognizes the importance of sustainability in ensuring long-term corporate value. Our commitment to sustainability encompasses environmental, social, and governance (ESG) considerations. This policy outlines the responsibilities of the Board and the company in integrating sustainability into our operations.

#### Sustainability Risks and Opportunities

At Habib Insurance Company Limited (HICL), we recognize that sustainability is not just about managing risks but also about seizing opportunities that contribute to our long-term success. Our approach to sustainability involves understanding and addressing both the risks and opportunities associated with environmental, social, and governance (ESG) factors.

#### Key ESG Performance Metrics

Our sustainability efforts focus on key areas that are critical to our business and stakeholders:

- *Environmental Responsibility:* We strive to minimize our environmental footprint through efficient resource use, waste reduction, and proactive management of environmental risks.
- *Social Impact:* HICL is committed to promoting a positive social impact by fostering an inclusive workplace, supporting community initiatives, and upholding high standards of human rights and labour practices.
- *Governance Practices:* Ethical conduct and strong governance are at the heart of our business. We are dedicated to upholding these values across all levels of our organization.

By integrating these metrics into our business operations, HICL aims to create a sustainable and responsible corporate environment that benefits all stakeholders

## **Managing Risks and Leveraging Opportunities**

HICL incorporates sustainability into its risk management process, addressing challenges such as climate change and evolving regulations to ensure we remain resilient. At the same time, we view sustainability as a pathway to innovation and growth, exploring opportunities in areas like green technologies and sustainable practices that can enhance our business and benefit the wider community.

Through this balanced approach of managing risks and seizing opportunities, HICL is committed to embedding sustainability into the core of our business, ensuring that we continue to thrive responsibly and sustainably.

## 4. Diversity, Equity and Inclusion (DE&I)

### Objective

At Habib Insurance Company Limited (HICL), we are dedicated to cultivating a workplace where diversity is embraced, equity is practiced, and inclusion is a fundamental part of our culture. Our Diversity, Equity, and Inclusion (DE&I) policy is designed to ensure gender equality and to promote the active involvement of women at all levels of the organization, from leadership to the broader workforce.

HICL's approach to DE&I is built on, but not limited to, the following principles:

- *Gender-Neutral Recruitment:* All roles at HICL are open to candidates regardless of gender, with the best candidate selected based on merit. Preference is given to female candidates, particularly in areas where women are underrepresented. However, merit remains the primary criterion, and where male and female candidates are equally qualified, other factors such as personality, expected compensation, and cultural fit will be considered.
- *Equal Training and Development:* We provide equal access to training and development opportunities for all employees, regardless of gender. This includes both internal and external programs. When additional training is needed to bring female employees to the same skill level as their male counterparts, specialized in-house training and mentoring will be provided to ensure everyone performs at their best.
- *Promotion and Professional Growth:* The professional growth and promotion opportunities for female employees are regularly reviewed to ensure that gender bias does not impede their advancement. We are committed to creating an environment where women have equal opportunities to grow and succeed in their careers.
- *Maternity and Personal Leave:* Female employees are entitled to maternity leave as specified in our HR manual. Additionally, we support female staff who need to take leave for marriage or personal reasons, with departmental heads instructed to facilitate these requests fairly and without unnecessary barriers.
- *Pay Equality:* HICL is committed to ensuring pay equity across all roles and grades. We regularly assess salaries to ensure there are no gender-based discrepancies. Any identified disparities will be corrected promptly, with measures put in place to prevent future issues.
- *Conveyance Allowance:* Female employees who do not have access to company-provided vehicles or are not entitled to a vehicle allowance based on their position are eligible for a special conveyance allowance. This allowance ensures safe and reliable transportation and is provided equally to all employees to maintain fairness.
- *Work Environment and Retention:* We strive to create a supportive work environment that offers equal opportunities for all employees to grow and develop professionally. When a female employee considers leaving the company, we assess her contributions and may offer retention packages based on merit to encourage her to continue her career with HICL.
- *Inclusive Practices:* We actively promote the inclusion of individuals from diverse racial, ethnic, and cultural backgrounds, ensuring that all employees feel respected and valued. Our policies are designed to accommodate various needs, including those related to disability and other personal circumstances, to support a truly inclusive workplace.

- 
- *Anti-Discrimination Measures:* We enforce strict policies against discrimination and harassment of any kind, ensuring that all employees are treated fairly and with dignity. Regular training and clear reporting mechanisms are in place to address any issues and promote a safe and respectful work environment.

This DE&I policy reflects HICL's commitment to creating a workplace that values diversity, practices equity, and promotes inclusion as a core part of our culture. By supporting and empowering all our employees, we aim to strengthen our organization and drive innovation and success.

## 5. Anti-Harassment

### Objective

The Anti-Harassment Policy at HICL is designed to safeguard the rights and well-being of our employees by establishing a clear framework for addressing harassment.

### Harassment

Harassment includes unwelcome sexual advances, requests for sexual favours, or any verbal or physical conduct of a sexual nature that creates a hostile or intimidating work environment or interferes with work performance. This also includes retaliation against an individual for refusing such advances. Manifestations of Harassment Includes:

*Abuse of Authority:* When a person in power demands sexual favours in exchange for job benefits such as promotions or wage increases.

*Hostile Environment:* Unwelcome conduct that creates an offensive work environment. Even a single severe incident can constitute harassment.

*Retaliation:* Negative actions taken against an employee for refusing sexual advances, including limiting job opportunities or creating negative gossip.

### Code of Conduct

Habib Insurance Company Limited (HICL) upholds a commitment to maintaining a work environment that is respectful, safe, and free from harassment. This Code of Conduct aligns with the "Protection Against Harassment of Women at the Workplace Act 2010". The Code outlines the behavioural expectations for all employees, management, and stakeholders to ensure a professional workplace where everyone is treated with dignity.

### Behavioural Guidelines:

All employees are expected to uphold the highest standards of conduct in their interactions. This includes showing respect for colleagues, avoiding any form of discrimination or inappropriate behaviour, and fostering a supportive work environment.

### Reporting Mechanisms:

Employees who experience or witness any inappropriate behaviour are encouraged to report their concerns through the appropriate channels. There are two options for reporting, depending on the nature and severity of the issue:

- *Informal Reports:* Employees can choose to report incidents informally by approaching their Immediate Supervisor, a Female HR Executive, or the Executive Coordinator. These reports can be resolved through mediation or counselling facilitated by the HR team or other designated personnel.
- *Formal Complaints:* For more serious issues, or if the employee prefers a formal process, complaints can be submitted through their Immediate Supervisor, Female HR Executive, or Executive Coordinator. Any formal complaint submitted through these channels will be forwarded to the Senior Management Team (SMT) for a thorough and confidential investigation. The SMT will review and investigate the complaint, ensuring that swift disciplinary action is taken against any staff members found involved in such activities.

## Investigation Process

- Upon receiving a formal complaint, the designated person will promptly gather detailed information from the reporter while ensuring that the process does not cause discomfort. This initial step is crucial for documenting the incident accurately and sensitively.
- The concerned person will then draft a confidential report for submission to the Senior Management Team (SMT) for further investigation. The SMT will conduct the investigation in strict confidence, either directly or by delegating it to a capable officer they trust to handle the matter with the necessary discretion.
- The investigating officer is required to submit their findings to the SMT within one week of receiving the assignment. Throughout this process, the company will take measures to prevent any retaliation against the complainant and may temporarily adjust work roles to minimize contact between the parties involved.
- Once the investigation is completed, parties found involved in misconduct will be issued show cause notices and will be required to present their case in person to the SMT. After hearing all sides, the SMT may take disciplinary action, which could include termination of employment and suspension of end-of-service benefits.
- In cases where a report is found to be false or misleading, the reporter will receive a warning. If repeated false or misleading reports are made, disciplinary action may be taken against the reporter.

## Preventive Measures

HICL is dedicated to preventing harassment and ensuring a safe workplace. This includes:

- Monitoring and reviewing work environments to ensure compliance with this Code.
- Protecting complainants from any form of retaliation during and after the investigation.
- Implementing temporary measures such as reassignment or suspension to protect all parties involved.

This policy outlines the fundamental standards of behaviour required to maintain a harassment-free workplace. While these guidelines establish essential expectations, HICL encourages all employees to strive for even higher standards to foster a positive and respectful work environment.

Our commitment to a workplace that values and protects every employee is reflected in this policy. All staff members are expected to follow these guidelines diligently and actively contribute to creating a safe and inclusive workplace.

Copies of the Code of Conduct will be displayed in both English and in a language understood by the majority of employees at a conspicuous location. Compliance with this requirement will be ensured to guarantee that all employees have access to and understand the policy.

## **6. Role of the Board**

The board is responsible for overseeing sustainability risks and opportunities, including environmental, social, and governance factors, and setting the company’s strategies and targets to drive long-term corporate value. To effectively manage these responsibilities, the ‘Ethics, Nomination, Human Resource & Remuneration Committee’—now including one female director. This committee will monitor and review sustainability-related risks and opportunities, ensure the implementation of DE&I practices, and oversee compliance with relevant laws. The committee will report to the board at least once a year on the integration of sustainability and DE&I principles into the company’s strategy and operations.