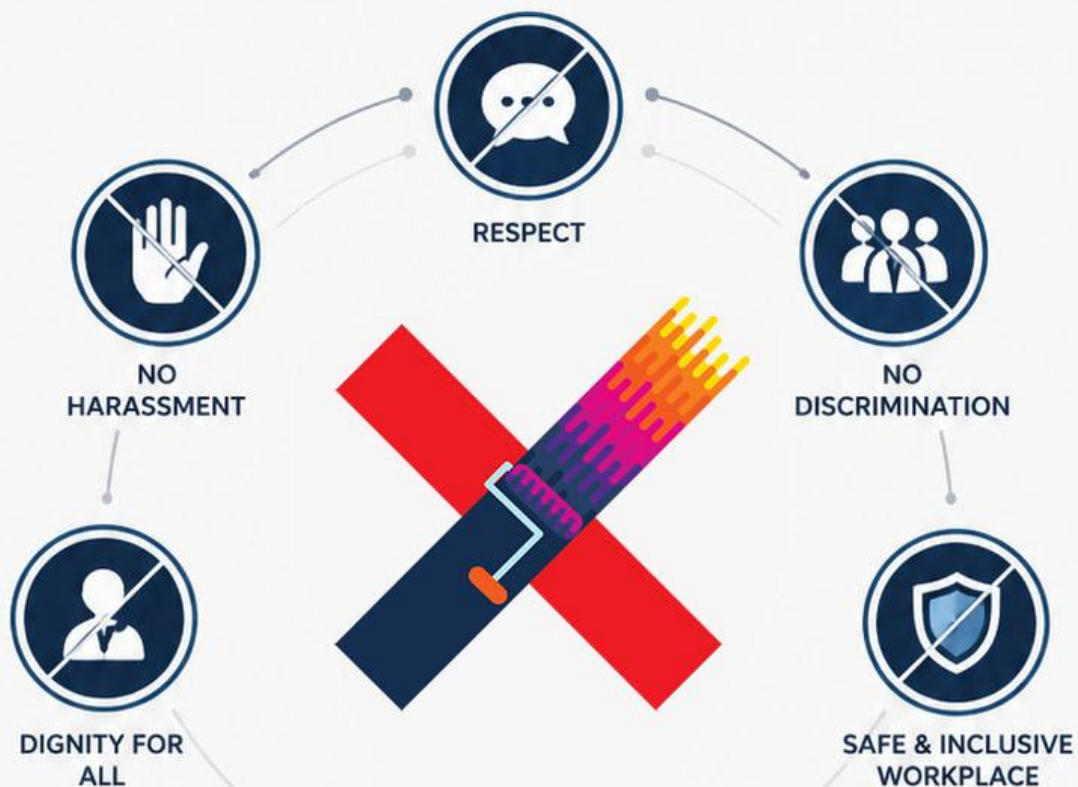




ANTI-HARASSMENT & ANTI-DISCRIMINATION

POLICY

A Respectful Workplace. Equal Opportunities. Zero Tolerance.



ZERO TOLERANCE
FOR MISCONDUCT



EQUAL RIGHTS
EQUAL OPPORTUNITIES



RESPECT
EVERY INDIVIDUAL



EVERY VOICE
MATTERS

1. Purpose Statement

The purpose of this policy is to create and maintain a workplace where all employees feel safe, respected, and valued. X Solutions Ltd. has a diverse workforce, with both male and female employees working together, and are committed to ensuring a professional environment free from any form of harassment or discrimination.

The Company maintains a zero-tolerance policy for any form of harassment, bullying and other forms of discrimination based on race, color, religion, sex, national origin, age, disability, and sexual orientation in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment.

2. Scope

This policy applies to:

- All permanent, probationary and contractual employees
- Interns and trainees
- Consultants

It covers behavior:

- Within office premises
- During office hours
- At work-related meetings, travel, and events
- In official communication (email, phone, messaging platforms)

3. Responsibilities

Employees & Staffs

- Maintain respectful behavior at all times
- Avoid actions or language that may offend others
- Cooperate in investigations if required
- Report incidents promptly

Supervisors & Management

- Lead by example
- Ensure team members follow this policy
- Take complaints seriously and report them to HR

HR Department

- Ensure awareness of this policy
- Receive and handle complaints confidentially
- Conduct fair and timely investigations
- Recommend appropriate actions

4. Definition of Harassment

Harassment means any unwelcome behavior that creates an intimidating, hostile, or offensive work environment.

5. Types of Harassment

5.1 Verbal Harassment: The use of offensive, abusive, insulting, or threatening words spoken or written—that hurt, humiliate, or intimidate a person and create a disrespectful or hostile workplace environment.

- Using abusive, insulting, or offensive language toward someone
- Making personal insults or derogatory comments
- Shouting at someone in a disrespectful or aggressive manner
- Repeated criticism meant to humiliate rather than improve performance
- Making sarcastic or mocking remarks to embarrass someone
- Spreading rumors or false verbal statements to damage reputation
- Threatening someone verbally or using intimidating language
- Making fun of someone’s accent, speech, or communication style
- Using disrespectful nicknames or labeling someone negatively
- Interrupting, dismissing, or speaking to someone in a demeaning tone regularly

5.2 Physical Harassment: Purposely Inappropriate physical contact, behavior, or action that invades a person’s personal space, causes discomfort, or creates fear or intimidation in the workplace.

- Inappropriate touching of any body part of the others
- Hugging, patting, or holding someone without consent
- Brushing or rubbing against someone intentionally
- Blocking someone’s movement or path in a threatening way
- Cornering or trapping someone in a confined space
- Physically invading personal space in an intimidating manner
- Grabbing, pulling, or holding someone’s hand or clothing without permission
- Throwing objects or making aggressive physical gestures toward someone
- Pushing, shoving, or intentionally bumping into someone
- Any form of physical intimidation that causes fear or discomfort

5.3 Sexual Harassment: Any inappropriate or unwelcome behavior of a sexual nature—such as comments, gestures, requests, or physical contact—that violates a person’s dignity and creates a hostile or uncomfortable working environment.

- Inappropriate sexual comments, jokes, or remarks about appearance or body

- Making sexual advances or asking or indicating seeking for sexual favors
- Unwanted touching, hugging, or physical contact
- Sending sexual messages, images, or videos through any platform
- Showing pornographic or sexually explicit content in the workplace
- Repeated personal messages with sexual intent despite refusal
- Sexual gestures, winking, or inappropriate body language
- Staring or leering in a sexually suggestive way
- Threatening or offering workplace benefits in exchange for sexual favors
- Following, stalking, or repeatedly contacting someone in a way that causes discomfort or fear

A single serious incident can also be considered harassment depending on the gravity of incident.

5.4 Visual Harassment: Purposely display or sharing of offensive, inappropriate, or sexual/non-sexual images, gestures, or materials that make others feel uncomfortable, disrespected, or unsafe in the workplace

- Showing sexually explicit images, videos, or content in the workplace
- Displaying offensive or inappropriate posters, drawings, or photos
- Sending unwanted sexual or offensive images through email or chat
- Making sexually suggestive gestures or hand signs
- Staring or leering at someone in a way that makes them uncomfortable
- Displaying obscene or disrespectful content on screens or devices in shared spaces
- Using screensavers, wallpapers, or visuals with sexual or offensive content in office areas
- Drawing or circulating inappropriate sketches or cartoons about a person
- Displaying symbols or content that insult or humiliate a specific gender or individual
- Projecting or sharing inappropriate visuals during meetings or presentations

5.5 Psychological: Purposely repeated behavior such as intimidation, threats, humiliation, or manipulation that negatively affects a person's mental well-being and creates fear, stress, or distress in the workplace.

- Constant criticism intended to humiliate or break colleagues' confidence
- Deliberately isolating someone from team communication or activities
- Spreading false rumors to damage a person's reputation or mental peace
- Continuous intimidation or fear-based behavior
- Undermining someone's work or achievements repeatedly without reason
- Gaslighting (making someone doubt their memory, perception, or judgment)

- Excessive monitoring or micromanaging to create artificial unnecessary stress or pressure
- Purposely setting unnecessary impossible & illogical deadlines or assigning unfair workload in order to give mentally pressure
- Repeated threats about job security without valid or formal reason

5.6 Body shaming: Any behavior, comment, or joke that mocks or criticizes a person's physical appearance, and it is strictly prohibited in the workplace

- Making negative comments about someone's weight or body size
- Mocking someone's height, posture or physical appearance
- Joking about someone's facial features or looks
- Joking or hamulating someone's disease or physical challenges
- Comparing someone's body to others in a humiliating way
- Commenting on skin color, complexion, or marks in a disrespectful way
- Criticizing someone's body shape or physical fitness unnecessarily
- Using insulting nicknames related to appearance
- Staring or pointing out physical features to embarrass someone
- Suggesting someone is "not fit enough" or "too fat/thin" in a degrading tone
- Making repeated remarks that create shame or insecurity about appearance

6. Sexual Harassment Complaint Committee (SHCC)

(As per High Court Guidelines of Bangladesh)

The company will appoint an internal Sexual Harassment Complaint Committee to ensure proper judgement and analysis of any incident. Committee composition:

- Minimum 3 members
- At least 1 female member
- Senior and neutral members
- Option to include external member (if required)

7. Definition of Discrimination

Workplace discrimination means unfair treatment of a person based on personal characteristics rather than merit or job performance. This includes both direct and indirect discrimination.

8. Prohibited Grounds of Discrimination

Discrimination is strictly prohibited based on gender (male or female), religion or belief, age, marital status, disability or physical condition, ethnic or social background, nationality or origin or any other personal, social or protected status

The following actions are not allowed at workplace:

- Treating an employee unfairly based on gender, religion, or background
- Denying promotion or opportunity without merit-based reason
- Paying different salaries for the same role and performance without justification
- Excluding someone from meetings, tasks, or projects due to personal bias
- Making negative assumptions about ability based on age, gender, or appearance
- Using offensive or biased language toward a person or group
- Giving less favorable work assignments based on personal preference or bias
- Refusing training or development opportunities without valid reason
- Favoring certain employees in hiring, appraisal, or recognition unfairly
- Creating or allowing a workplace culture that isolates or marginalizes individuals or groups

9. Addressing Complaint & Investigation Process

Employees are encouraged to report any incident of harassment or discrimination as early as possible.

9.1 Whom to Report

- Directly to HR, keeping respected line manager in information loop is optional
- Not to HR but to the immediate supervisor (if comfortable)

9.2 Channels to Report

- Formal mail through official email address properly
- In case of fear or concern, employees may use speakup.justanx.com to report issues, either with disclosed identity or anonymously
- Adding reference, witness or any kind evidence is highly appreciated for serious offence proof.

9.3 Inquiry & Investigation Process

1. Acknowledgement: Within 3 working days

2. Preliminary Review: Check if formal inquiry is needed
3. Show Cause Notice: Issued to accused employee
4. Domestic Inquiry Committee Formation
5. Hearing Process:
 - Both parties present statements
 - Witnesses may be called
 - Evidence reviewed
6. Inquiry Timeline:
 - Completed within 15–30 working days
7. Investigation Report:
 - Findings submitted to management
8. Final Decision:
 - Based on evidence and recommendations

9.4 Investigation and Verdict Timeline

- Preferably within 30 working days of the incident
- Delay may be accepted with valid reason

10. Confidentiality

All complaints and related information will be handled with strict confidentiality. Information will only be shared on a need-to-know basis to ensure a fair investigation. The company strictly prohibits retaliation against any employee who:

- Files a complaint in good faith
- Participates in an investigation

Any act of retaliation will be treated as a serious violation of this policy.

11. Disciplinary Actions

As per Bangladesh Labor Act, 2006- All actions will follow legal procedures including opportunity to defend, fair hearing & documentation. If allegation is proven after proper inquiry, the following actions may be taken:

11.1 Minor Misconduct:

- Verbal warning
- Written warning

11.2 Major Misconduct:

- Show cause notice
- Suspension (as per law)

- Demotion or transfer
- Termination of employment

11.3 Serious Offences (e.g., sexual harassment, physical abuse):

- Immediate suspension pending inquiry
- Termination after due process

12. False or Malicious Complaints

If a complaint is found to be intentionally false or made with malicious intent, disciplinary action may be taken against the complainant. However, inability to prove a complaint will not automatically make it false.

13. Policy Review and Compliance

This policy will be reviewed periodically as & when required to ensure compliance with:

- Bangladesh Labor Act, 2006
- High Court guidelines on sexual harassment

14. Effective Date

This policy is effective from: Date of publish.

