



HARASSMENT POLICY

	HARASSMENT POLICY	Ref. No.: Q3-POL-HAR
		Revision: 00
		Effective Date: 31/12/2025

1.0 Objectives

This policy aims to

- a) Establish a safe, respectful, and inclusive workplace environment, free from all forms of harassment, including sexual harassment and other inappropriate conduct.
- b) Provide clear guidance to employees on what constitutes harassment, how it will be addressed, and the responsibility of all parties in preventing such behaviour.
- c) Outline procedures for reporting, investigating, and resolving harassment complaints in a fair and confidential manner.
- d) Ensure compliance with applicable laws, regulations, and ethical standards related to workplace conduct.

2.0 Scope:

2.1 This policy applies to:

- 2.1.1 All employees of the Company, including full-time, part-time, contract staff, interns, trainees, and consultants.
- 2.1.2 All work-related settings and activities, whether conducted on Company premises or off-site (example: business trips, training programs, official events, online/virtual platforms).
- 2.1.3 All third parties engaged with the Company, including clients, vendors, service providers, and visitors, where interactions involve Company personnel.


2.2 The actions and responsibilities are as defined below:


2.2.1 Employees / Complainant

- a) Employees / Complainant are encouraged to address their concerns or report any incidents of harassment they experience or witness promptly to the Manager or the Human Resources Department.
- b) Employees / Complainant should keep a written record of the details of the alleged incident(s) of harassment, including time, locations and name of witnesses, if any. All information should be kept confidential.
- c) Employees / Complainant shall also attend training sessions on harassment organized by the Company, familiarize themselves with the harassment policy and procedures.
- d) Employees / Complainant should maintain confidentiality and avoid discussing the matter widely.
- e) Employees / Complainant have a responsibility to cooperate in any investigation of a harassment complaint and provide truthful information.

2.2.2 Managers

- a) Managers are responsible for ensuring that this policy is enforced and be alert to signs of possible harassment in the workplace.
- b) Managers should take immediate and appropriate action when they become aware of potential violations.

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<p>c) Managers are responsible to maintain confidentiality and protect privacy of all parties involved in a complaint.</p> <p>2.2.3 Human Resource Department (HRD)</p> <p>a) HRD are responsible to develop, update, and communicate the harassment policy. A regular training sessions for employees and management on preventing and addressing harassment should be conducted to ensure that this policy is consistently applied and understood by all employees.</p> <p>b) HRD must conduct thorough and impartial investigations into reported incidents and maintain accurate records of complaints and documentation.</p> <p>c) HRD is responsible to provide resources, coordinate interim measures and support the employee affected by harassment and ensure their safety.</p> <p>d) HRD to support DI administration, prepare correspondence and monitor corrective actions.</p> <p>2.2.4 Managing Director & Directors</p> <p>a) The Managing Director and Director to lead and oversee formal investigations where required, review findings, and approve outcomes/actions.</p> <p>b) The Managing Director and Director to appoint Investigation Committee/DI panels (if required)</p> <p>c) The Managing Director and Director are responsible to approve or endorse disciplinary actions involving suspension, demotion, or dismissal.</p> <p>d) The Managing Director and Director are responsible to ensure the disciplinary process complies with the Company's values, policies, and legal requirements.</p> <p>e) The Managing Director and Director serve as final appeal authority.</p> <p>3.0 Definition:</p> <p>3.1 HRD – Human Resources Department</p> <p>3.2 Complainant – The individual reporting or alleging harassment.</p> <p>3.3 Respondent – The individual accused of harassment.</p> <p>3.4 Informal Approach – Attempt to resolve suitable minor issue through direct approach or discussion/mediation/coaching, facilitated by management/HRA where appropriate.</p> <p>3.5 Formal Approach – A written complaint submitted to HRD or Managing Director for investigation.</p> <p>3.6 Domestic Inquiry (DI) – A formal hearing process convened for sexual harassment and/or serious misconduct cases where serious disciplinary action may be considered.</p> <p>4.0 References:</p> <p>4.1 Employment Act 1955 (Sections 81A – 81G, Amendment 2022)</p> <p>4.2 Industrial Relations Act 1967 (Section 8, 20, and 30(5))</p> <p>4.3 Occupational Safety & Health (OSHA) 1967 (Section 15(1), 15(2), and 24)</p> <p>4.4 Code of Practice on the Prevention and Eradication of Sexual Harassment in the Workplace (1999)</p> <p>4.5 Company Handbook</p> <p>4.6 Harassment Standard Operating Procedure</p> <p>5.0 Relevant Records:</p> <p>5.1 Grievance & Harassment Complainant Form</p>		

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<p> 5.2 Investigation Report / DI Report 5.3 Meeting Notes and Witness Statements 5.4 Disciplinary Action Record 5.5 Acknowledgement Letter, Outcome Letter and Appeal correspondence 5.6 Show Cause Letter (SCL) and Notice of Domestic Inquiry (where applicable) </p> <p> 6.0 Policy: </p> <p> 6.1 Definition </p> <p>Harassment refers to any unwelcome, offensive, or inappropriate verbal, non-verbal, written or physical conduct that causes humiliation, threat, intimidation, distress, or interferes with an individual's work performance or creates a hostile work environment.</p> <p> 6.2 Types of Harassment </p> <p> 6.2.1 Sexual Harassment Includes any unwelcome sexual advances, requests for sexual favours, or other verbal, non-verbal, visual, psychological, or physical conduct of a sexual nature. Examples of conducts or behaviours which constitute sexual harassment include, but are not limited to: </p> <ul style="list-style-type: none"> a) Physical conduct <ul style="list-style-type: none"> • Unwanted touching, patting, hugging, kissing, fondling or inappropriate touching. • Physical violence, including sexual assault. • The use of job-related threats or rewards to solicit sexual favours. b) Verbal conduct <ul style="list-style-type: none"> • Comments or jokes about a person's body, appearance, age or private life. • Repeated unwanted invitations for dates or physical intimacy. • Sexual comments, stories and jokes. • Sexual advances. • Insults based on the sex of the worker. • Condescending or paternalistic remarks. • Sending sexually explicit messages or images via email, text, or social media. c) Non-verbal conduct <ul style="list-style-type: none"> • Display of pornographic or sexually suggestive materials. • Sexually suggestive gestures, whistling, or leering. <p> 6.2.2 Racial or Religious Harassment Offensive comments, jokes, or behaviour directed at a person's race, religion, or ethnicity. </p> <p> 6.2.3 Bullying and Psychological Harassment Unreasonable or repeated behaviour such as humiliation, intimidation, threats, excessive criticism, exclusion, or spreading malicious rumours. </p>		

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- 6.2.4 Abuse of Authority
Misuse of position or power to humiliate, intimidate, or control another person.
- 6.2.5 Digital or Cyber Harassment
Offensive, hostile, or inappropriate messages, posts, or images shared via email, social media, or other online platforms.
- 6.2.6 Stalking
Repeated unwanted behaviour causing fear, distress, or safety concerns which include following, excessive messaging, monitoring and showing up uninvited.

6.3 Reporting Channels

Reports can be submitted to:

- a) HRD
 - b) Directors or
 - c) Managing Director
- If the complaint involves other employees/stakeholders, report directly to Human Resource Department
 - If the complaint involves Human Resource Department, report directly to Director/Managing Director
 - If the complaint involves Director, report directly to Managing Director

6.4 Complaint Procedure

6.4.1 Informal Resolutions
Employee (or claimant) who is experiencing or affected by harassment may take an informal approach, if he / she considers appropriate, in resolving the problem by raising the matter directly with the respondent (the “alleged harasser”). It is possible that the alleged harasser may not realize that this behavior is unwelcome or offensive. Employees may make an initial attempt to make it clearly known to the alleged harasser that his / her behavior is contrary to this Policy and that he / she should stop behaving in this manner.

Alternatively, an employee may seek the help of his / her Manager or HRD to informally approach the alleged harasser on his / her behalf.

If an employee is dissatisfied with the informal approach or finds it inappropriate in the circumstances or unsuccessful, he / she may proceed with a formal complaint at any time. Nothing prevents the employee from making such a complaint immediately if he / she feels that the conduct is serious enough to warrant such an approach. The formal complaint should be made in writing to the Managing Director or Human Resources Department.

6.4.2 Formal Resolutions
An employee who has been directly harassed or has witnessed or is affected by the harassment of others should report such conduct to the Human Resources Department or through the established grievance channels. If the employee needs help in determining whether harassment has occurred, or whether to take the

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formal or informal approach, he / she could seek advice from the Human Resources Department.

Before submitting a formal report, the complainant should prepare a brief factual record covering:

- a) The date(s), time(s), and location(s) of each incident
 - b) A clear description of what occurred (including any verbatim words/actions where recalled)
 - c) The name, designation, and contact details of the alleged harasser, any witnesses and their contact details
 - d) Any available evidence (example: emails, messages, screenshots, photos, call logs, CCTV timestamps)
 - e) The immediate impact (example: safety concerns, emotional/physical effects, work disruption).
 - f) Any steps already taken (example: telling the person to stop, informing a supervisor), and the preferred resolution or interim safety measures sought.
- Notes should be objective and contemporaneous wherever possible.


Allegations of harassment will be treated seriously and due regard to the need for confidentiality will be given. The Company aims to resolve any complaints as quickly as possible. Under no circumstances shall the employee alleging the harassment be required to file a complaint with the person responsible for the alleged harassment.

An investigation will be conducted as confidentially as possible to avoid any embarrassment to the parties. Both the complainant and the alleged harasser will be separately interviewed, as will any individuals who may be able to provide relevant information. Every employee is expected to cooperate in any investigation if requested.

Investigations will be conducted fairly, with both the complainant and respondent given the opportunity to be heard, and relevant witnesses interviewed where necessary. Where a Domestic Inquiry (DI) is required (including for sexual harassment or where serious disciplinary action may be considered), the Company will appoint a DI Panel/Committee to conduct the hearing in accordance with the Grievances & Harassment Report Procedure (Q3-HR-GR-010) and the principles of natural justice.

The outcome of the investigation will be communicated to the employee making the complaint. Any complaint will be resolved within thirty (30) days from the date the complaint is received. If an extension is required, the Human Resources Department will communicate this in writing. Where an employee is dissatisfied with the outcome of the investigation, he/she may appeal to the Managing Director in writing within seven (7) working days from the date he/she is officially informed of the outcome.

A complaint received by the Human Resources Department, or any other person will be kept strictly confidential. Information acquired from the investigation will also be kept confidential. All parties involved in the investigation, including both the victim and the harasser (alleged or otherwise), are required to keep such information secret.

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<p>Although the Company encourages a team member suffering from harassment to report the matter, any false accusations, fabricated allegations or otherwise complaints against another made in bad faith are considered as misconduct and there may be disciplinary measures taken against the employee making such accusations, allegations or complaints.</p> <p>6.5 Interim Measures and Safety HRD may implement measures to prevent further harm and to protect confidentiality (e.g., no-contact instruction, changes to reporting line/seating, temporary work arrangement, precautionary suspension where necessary). If the matter may involve a criminal offence, the complainant will be informed of the option to lodge a police report and the Company will cooperate with lawful investigations.</p> <p>6.6 Disciplinary Measures, Restitution and Appeal</p> <p>6.6.1 The Company treats harassment as misconduct. Disciplinary actions shall be taken by anyone accused of such acts. If the investigation reveals evidence to support the complaint and it is upheld, the harasser will be disciplined in accordance with the Disciplinary Procedures. The nature and severity of the disciplinary measures shall be commensurate with the gravity of the harassment. Such measures may therefore include a written warning, suspension, demotion, or dismissal. The incident will also be documented in the harasser's file.</p> <p>6.6.2 False or malicious allegations made in bad faith will also constitute misconduct. Where an investigation establishes that a complaint was made in bad faith, with deliberate intent to deceive, mislead, or retaliate, disciplinary action will be taken against the individual who made the false claim. Depending on the severity of the misconduct, such action may include a formal warning, suspension, or dismissal.</p> <p>6.6.3 Employees found not guilty of harassment will be reinstated with any withheld payments or benefits.</p> <p>6.6.4 If an employee is dissatisfied with the outcome of the investigation, he/she may submit a written appeal to the Managing Director within seven (7) working days from the date of official notification. The Managing Director shall serve as the final appeal authority and will communicate the final decision within seven (7) working days upon receipt of the appeal.</p> <p>6.7 Confidentiality All complaints, investigations, and outcomes shall be handled with strict confidentiality. Information will only be disclosed to those directly involved in resolving the case. Breach of confidentiality will result in disciplinary action.</p> <p>6.8 Training and Awareness The Company shall regularly conduct training and awareness sessions to ensure all employees understand this policy, know how to recognise harassment, and are aware of the reporting process.</p> <p>To achieve this, the Company shall:</p> <ol style="list-style-type: none"> a) Conduct mandatory induction briefings for all new employees within their first week of employment, introducing the Harassment Policy, reporting channels, and non-retaliation assurance. b) Organise annual refresher briefing for all employees (minimum one hour) to reinforce awareness of what constitutes harassment, how to recognise inappropriate behaviour, and how to report incidents safely and confidentially. 		



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- c) **Display and circulate awareness materials** such as posters, digital slides, and e-learning reminders that promote dignity, respect, and inclusion across all workspaces.
- d) **Maintain training attendance records and materials** as part of compliance documentation for audit.

6.9 Review and Interpretation

This policy shall be reviewed whenever amendments to the Employment Act or related policies occur or when necessary.

6.10 Process Flow

