
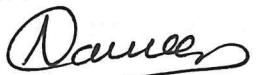


SEXUAL HARRASSMENT POLICY
FOR
UNIVERSAL ENGINEERING SYSTEMS LIMITED

TITLE:	SEXUAL HARRASSMENT POLICY	
REVISION: 09:2021	UESL_EHS_ESHPM__01/07_2021	
NAME DESIGNATION SIGNATURE	MRS. NAUREEN ALAM MANAGING DIRECTOR 	DATE: 05th Nov 2021



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SEXUAL HARASSMENT POLICY

This policy applies to every person Universal Engineering Systems Limited regardless of gender, sexual orientation, level, function, seniority, status or other protected characteristics. We are all obliged to comply with this policy.

SCOPE

Universal Engineering Systems Limited will not tolerate sexual harassment from inside or outside of the company and will make every reasonable effort to prevent and eliminate conduct which falls within the scope of this Policy. The company affirms its commitment to ensuring a safe environment for all employees, investors, contractors, customers and everyone interacting with our company; which is fair, humane, conducive, respectful and free from sexual harassment.

What is sexual harassment?

Sexual harassment has many forms of variable seriousness. A person sexually harasses someone when they:

- Insinuate, propose or demand sexual favors of any kind;
- Invade another person's personal space (e.g. inappropriate touching.);
- Stalk, intimidate, coerce or threaten another person to get them to engage in sexual acts;
- Send or display sexually explicit objects or messages;
- Comment on someone's looks, dress, sexuality or gender in a derogatory or objectifying manner or a manner that makes them uncomfortable;
- Make obscene comments, jokes or gestures that humiliate or offend someone;
- Pursue or flirt with another person persistently without the other person's willing participation;

The most extreme form of sexual harassment is sexual assault. This is a serious crime and our company will support employees who want to press charges against offenders.

COMPANY'S RULES ON SEXUAL HARASSMENT

1. **No one has the right to sexually harass our employees.** Any person in our company who is found guilty of serious harassment will be terminated, whether they are managers or shop floor employees. Also, if representatives of our contractors or vendors sexually harass our employees, we will demand that the company they work for takes disciplinary action and/or refuse to work with this person in the future.
2. **Sexual harassment is never too minor to be dealt with.** Any kind of harassment can wear down employees and create a hostile workplace. We will hear every claim and punish offenders appropriately.



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3. **Sexual harassment is about how we make others feel.** Many do not consider behaviors like flirting or sexual comments to be sexual harassment, thinking they are too innocent to be labeled that way. But, if something you do makes your colleagues uncomfortable, or makes them feel unsafe, you must stop.
4. **We assume every sexual harassment claim is legitimate unless proven otherwise.** We listen to victims of sexual harassment and always conduct our investigations properly. Occasional false reports do not undermine this principle.
5. **We will not allow further victimization of harassed employees.** We will fully support employees who were sexually harassed and will not take any adverse action against them. For example, we will not move them to positions with worse pay or benefits or allow others to retaliate against them.
6. **Those who support or overlook sexual harassment are as much at fault as offenders.** Managers and HR especially are obliged to prevent sexual harassment and act when they have suspicions or receive reports. Letting this behavior go on or encouraging it will bring about disciplinary action. Anyone who witnesses an incident of sexual harassment or has other kinds of proof should report to HR.

GUIDING PRINCIPLES

This Policy shall be guided by the guiding laws and principles that are outlined below and international conventions and shall promote the rule of law and promote and protect human rights:

1. The Constitution of Kenya; Article 27, 28 & 29 – Kenya;
2. The Sexual Offences Act No. 3 Of 2006 – Kenya;
3. The Employment Act, 2007 – Kenya;
4. The Protocol to the African Charter on Human and Peoples' Rights on the Rights on the Rights of Women in Africa

REPORTING OF SEXUAL HARASSMENT

If you are being sexually harassed (or suspect another person is being harassed), please report it to the HR manager, or your immediate manager. In serious cases like sexual assault, please call the police and inform HR that you plan to press charges. We acknowledge it's often hard to come forward about these issues, but we need your help to build a fair and safe workplace for you and your colleagues.

If you report assault to the police, our company will provide any possible support until the matter is resolved. In any case, we will ensure you are not victimized and that you have access to relevant evidence admissible in court, like security video footage or emails (without revealing confidential information about other employees.)



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Inadvertent harassment

Sometimes, people who harass others do not realize that their behavior is wrong. We understand this is possible, but that doesn't make the perpetrator any less responsible for their actions.

If you suspect that someone doesn't realize their behavior is sexual harassment under the definition of this policy, let them know and ask them to stop. Do so preferably via email so you can have records.

DISCIPLINARY ACTION AND REPEAT OFFENDERS

Employees who are found guilty of sexual assault will be terminated after the first complaint and investigation.

Employees who are found guilty of sexual harassment (but not assault) the first time may:

- Be reprimanded and fined.
- Get a "below expectations" performance review with no promotion

We will terminate repeat offenders after the second claim against them if our investigation concludes they are indeed guilty.

We apply these disciplinary actions uniformly. Employees of any sexual orientation or other protected characteristics will be penalized the same way for the same offenses.

HUMAN RESOURCE RESPONSIBILITIES

First and foremost, HR and managers should try to prevent sexual harassment by building a culture of respect and trust. But, when sexual harassment occurs and an employee makes a complaint, both HR and managers must act immediately.

Managers should talk to HR and explain our company's procedures to their team member who made the complaint.

When HR receives a complaint that an employee harasses another employee, they will:

- Ask for as many details and information as possible from the person or people making the complaint.
- Keep copies of the report with dates, times and details of incidents and any possible evidence in a confidential file (separate from the personnel file.) HR should update this file with all future actions and conversations regarding this complaint.
- Launch an investigation. If the matter is complex, the HR person can defer to a more senior manager.



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- Check if there have been similar reports on the same person. If there are, HR should contact the perpetrator's manager to let them know that their team member may get fired when the investigation is over.
- Inform the harassed employees of our company's procedures and their options to take legal action if appropriate.
- Take into account the wishes of the harassed employee. Some might want the matter to be resolved informally and discreetly, while others might expect more radical actions (e.g. transferring the perpetrator.) HR should consider the circumstances and decide on appropriate action.
- Contact the harasser and set up a meeting to explain the complaint and explicitly ask for this behavior to stop, **or**,
- Arrange for mediation sessions with the two employees (harasser and perpetrator) to resolve the issue, if the harassed employee agrees **or**,
- Launch a disciplinary process depending on the severity of the harassment. In cases of sexual assault or coercing someone to sexual favors under threats, we will terminate the harasser immediately. We will terminate employees who are found guilty in a court of law of sexually assaulting another employee, even if HR has not conducted its own investigation.

HR or managers must not, under any circumstances, blame the victim, conceal a report or discourage employees from reporting sexual harassment. If HR or a manager behaves that way, please send an email to the company Managing Director explaining the situation.

SPEAK UP, WE LISTEN

By raising your voice on this issue, you help our company create a happy workplace and thrive.

Approved by:

Signature: 

Name: **MRS. NAUREEN AHAM**

Title: **MANAGING DIRECTOR**

Date: **05th NOV 2021**



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