

FIRST CAPITAL EQUITIES LIMITED (“FCEL” or “the Company”)

WORKPLACE DIVERSITY POLICY

PURPOSE

FCEL is dedicated to growing a rich culture, diverse workforce and a work environment in which every employee is treated fairly, respected and has the opportunity to contribute to business success, while being given the opportunities to realize their full potential as individuals.

The term work place diversity is used in this document to describe a workplace composed of employees with varying characteristics, such as language, religion, age, gender, race, ethnicity and sexual orientation, etc.

APPLICABILITY

This policy applies to all staff members employed, directly or engaged through contractors, by FCEL and its subsidiary companies.

POLICY STATEMENT

a. FCEL is committed to provide:

- merit-based employment;
- non-discrimination, diversity and inclusion;
- a fair, flexible, safe and rewarding workplace; and
- equity in employment.

b. FCEL ensures that employment and employee development decisions are purely objective and encourages every individual to feel and be an important part of the organization. Our purpose is to ensure a diverse workplace where people are encouraged to perform their duties without any fear of reprisal for their particular characteristics. FCEL believes in an inclusive policy which rewards every employee on merit and provides all employees an equal opportunity to grow and develop their career. FCEL has operations in all parts of the country and encourages people from all regions to apply for positions in the company. Selection is made without any regard to regionality, religion, language spoken or political beliefs or any other form of discrimination.

c. For the purpose of this document, some of the work place diversities are enumerated below:

- Race:** Discrimination based on race will not be allowed in any circumstances.
- Ethnicity:** There should be no Ethnic discrimination on the work place.
- Gender:** Discrimination based on Gender on work place will not be allowed in any circumstances.
- Sexual Orientation:** No sexual orientation discrimination will be tolerated.
- Physical Abilities and Disabilities:** No discrimination based on physical abilities and disabilities will be accepted.
- Religion:** Segregation and discrimination on religion and sect belief will not be tolerated.

- **Political Beliefs:** Employees will not be judged and discriminated on their political beliefs.
- **Regionality:** Employees will not be differentiated on basis of the region of the country that they come from.
- **Language:** While a knowledge of some particular languages may be a need for some jobs, no employee shall be discriminated against on grounds of his mother tongue.

IMPORTANCE OF WORKPLACE DIVERSITY

In this modern and globally connected world, companies need diverse workforce in order to be successful. Companies with diversified work force have numerous advantages over those who lack work force diversity. There are many benefits of diverse work force. The company acknowledges that a policy of workforce diversification and inclusion can yield the following advantages, among others:

- Variety of different perspectives, that improves the quality of decisions made;
- Increased creativity through access to a wider range of talents;
- Faster and efficient problem-solving due to better understanding of any given situation;
- Better operational efficiency;
- Improved employee engagement leading to quicker problem-solving;;
- Reduced employee turnover arising from higher level of employees' motivation;
- Improved company reputation expanding its access to better quality candidates;
- Improved hiring results.

GENDER DIVERSITY

Gender diversity in a work place means that men and women are hired at a similar and consistent rate, are paid equally and are given the same working and development opportunities.

This policy guarantees that:

- a. All FCEL employees' will be treated fairly and with respect. For the purposes of this policy, the term "employee" includes Board Members, Directors, Managers, officers, all regular and contract employees, subordinate staff and interns.
- b. All employees are entitled to a workplace free from harassment and discrimination.
- c. All employees will have the opportunity to contribute and achieve their potential.

SCOPE OF THE POLICY

This Policy covers:

a. Recruitment & Selection

FCEL advertises all vacant positions on its website and states clearly that it welcomes applications from all sections of the community/Gender. Selection for employment will strictly be on the basis of relevant criteria, experience, aptitude and ability. However, except for those

matters prescribed in the labor laws, the company does not practice quota system in favor of or against any specified group.

b. Promotion

All promotions will be awarded on the basis of each employee's individual performance vis a vis the specific requirements of the position to which the promotion is made. Promotion would be strictly observed on standards set by FCEL. FCEL does not permit any discrimination in promotion on the basis of gender, religion, ethnicity, race, etc.

c. Retention

FCEL attaches a lot of importance to the retention of employees. It therefore provides fair and equal opportunities for the all employees irrespective of their background such as religion, gender, ethnicity, race, sect etc. FCEL offers market competitive remuneration and fringe benefits for its employees in order to retain and motivate them. These include, inter alia, provident fund, performance based bonus, annual bonus, health medical & life insurance facilities, Training & development of employees etc. as provided in the HR Manual.

d. Compensation & Benefits

FCEL fairly compensate employees purely on the basis of experience, education, skill set, job grade, and performance without gender or any other form of discrimination.

e. Professional Development

FCEL provides access to learning and development opportunities to all staff without any discrimination. FCEL's professional development is directly linked with TNA (Training Need Analysis) which has been designed by HR Dept and approved by BOD of the company.

f. Flexible Working Options and Safe Working Environment

FCEL provides an access to a range of flexible work opportunities to support its employees who may have special circumstances. FCEL HR policies also prohibits all forms of physical or verbal harassment to ensure a safe working environment for all employees. The company also follows all safety measures as prescribed by the law and adopted by the company's procedure manuals.

g. Maternity & Iddat Leaves

In order to ensure that we take account of the needs of our employees' pregnancy or maternity, the Company grants paid maternity leave of 90-120 days to its eligible female employees as per its HR Manual.

In the event of the death of a Muslim female employee's husband, the company grants iddat leave, with pay, for 130 days (4months 10 days).

In case of a female employee being divorced, she is entitled to with pay 90 days (3months) leave as per the provisions of the HR manual.

h. Grievances, Disciplinary Action and Termination of Employment

FCEL ensures, where applicable, grievance and disciplinary procedures are in place and are carry it out fairly and uniformly for all its employees. Where redundancy is inevitable, the Company carefully monitors the criteria and procedure to ensure that these are executed fairly and on equitable grounds. FCEL does not directly or indirectly discriminate against any employees in matters relating to redundancy or termination of service.

i. Speak Up Policy:

FCEL employees have been given a right to speak against any officer or other colleague who is causing any kind of harassment and verbal or physical abuse. The company offers a number of platforms for its employees in order to convey these grievances to senior management such as filing formal complaints, suggestions in person, feedbacks, suggestion and speak-up box. In particular, the Company has a formal Whistle-blowing Policy with a well-defined procedure for registering and resolving all complaints received from, inter alia, employees.

J. Anti- Harassment Investigation committee:

All cases of harassment (sexual or otherwise) shall be forwarded to Anti-Harassment Investigation committee to be formed by the Board of Directors, comprising of following members:

- (i) CEO;
- (ii) Executive Board member;
- (iii) Head of HR Department;

k. Gender inclusive Customer base and Supply base:

FCEL does not directly or indirectly discriminate against Customers and suppliers in matters relating to Customer base and Supply base.

DISABILITY

FCEL understands that each individual is mentally and physically unique in its own way. It emphasizes on recognizing the mental and physical differences of all individuals and treating them fairly in regard to the employment opportunities. FCEL is committed to providing employment opportunities to employees with disabilities to share their challenges and work together in achieving their personnel and company goals, in accordance with the law of the land.

FORMAL WHISTLE-BLOWING POLICY

FCEL has already designed and implemented a “Whistle Blowing Policy” which is fully operational on country wide basis. Employees can report any incidents of discrimination, on whatever grounds, or abuse or offensive behavior by any officer or colleague, under this policy. All employees are encouraged to read about the WB policy and use it if they find it necessary to do so.

Any employee found preventing another employee from using the official Whistle-blowing Policy, already included in the HR Manual of FCEL, would be liable to face strict disciplinary action in accordance to the prescribed penalties of the company.

PROCEDURES

When managing diversity FCEL will:

- a. Attract and retain a skilled diverse workforce that best represents the talent available in the communities in which our assets are located and our employees reside.
- b. Promote and maintain a work environment that values and utilizes the contributions of employees with diverse backgrounds, experience and perspectives through improved awareness of the benefits of workplace diversity, conducive human resources policies, systems and processes and successful management of diversity.
- c. Build and maintain a safe work environment by taking action against inappropriate workplace behavior including discrimination, harassment, bullying, victimization and vilification.
- d. Ensure that applicants and employees of all backgrounds are encouraged to apply, and have a fair opportunity to be considered, for all available roles in the company.

RESPONSIBILITIES

It is the shared responsibility of all directors, managers, officers and employees to comply with the Company's Workplace Diversity Policy and report violations or suspected violations in accordance with this Diversity Policy. Reports not falling within the scope of Whistle-blowing Policy can be lodged with the Head of HR Function, or the Chairman of HRRC Committee of the Board.

Departmental Heads are responsible for understanding their role in promoting diversity, communicating and implementing policies and procedures effectively and working with staff to integrate the values of diversity into employment practices.

Executive management will lead and approve policy review, and/or revision as appropriate. HR Head will file suitable reports in this regard with CEO to enable the executive management, and where appropriate, the BoD monitor the data collected in this regard.

COMPLIANCE

Any breach of compliance with the Company's work diversity Policy may be directly reported under the procedure prescribed in the "Whistle Blowing Policy" of FCEL. Any employee found, the relevant forum, as being in breach of this workplace diversity policy would be subjected to strict disciplinary action, which may even lead to termination. FCEL has granted its employees the right to file any complaint against the perpetrator(s) of discrimination or harassment with appropriate officer under this policy. The Company shall accord due protection to the victim according to rules and regulation of the company. FCEL is committed to protect those staff members (witnesses) who report the incident of harassment and discrimination in a good faith/good deed under the terms of the company's policy. Retaliation against staff members (witnesses) reporting the breach of this policy will lead to disciplinary proceedings which may even lead to summary dismissal.