	ANTI-SEXUAL HARASSMENT POLICY	
	Policy No.: PS-HR-004-2022	Effective Date: April 1, 2022 Revision No. 1

I. PURPOSE AND SCOPE

Pursuant to the provisions of Section 4, Republic Act No. 7877, An Act Declaring Sexual Harassment Unlawful in the Employment, Education or Training Environment, and For Other Purposes, Maynilad is committed to maintaining a work environment that is free from sexual harassment and all forms of sexual intimidation and exploitation. In keeping with this commitment, the Company will not tolerate harassment of Maynilad Employees by anyone, including any of its Directors, Consultants, co-workers, vendors, clients or customers.

II. DEFINITION OF TERMS

- A. **Company or Maynilad** - refers to Maynilad Water Services, Inc.
- B. **Consultants** - refers to professional consultants, firms, partnerships, counsels, or such other professional entities or individuals rendering professional or specialized expert services to Maynilad and/or any company in the Group, as well as advisors of the Company who may be appointed by the Board of Directors or the President and Chief Executive Officer ("CEO"), or who shall act as representatives of the Company's investors, shareholders, affiliates or partners.
- C. **Directors** - refers to members of the Board of Directors duly elected in accordance with law, any shareholders' agreement and the By-laws of the Corporation.
- D. **Employees** - refers to officers, executives and Employee(s) of the Company under a contract of employment, whether for part-time or full-time, to provide personal services to the Company in exchange for compensation, and do not provide such services as part of an independent business. This includes executives, managers, supervisors and rank-and-file.
- E. **Sexual Harassment** - refers to a behavior that is not welcome, that is personally offensive, debilitates morale and, therefore, interferes with work effectiveness. Such behavior may be in the form of unwanted physical, verbal or visual sexual advances, requests for sexual favors, and other sexually oriented conduct which is offensive or objectionable to the recipient, including, but not limited to, epithets, derogatory or suggestive comments, slurs or gestures and offensive posters, cartoons, pictures, or drawings.


III. GENERAL POLICY STATEMENT

Maynilad believes that Employees should be afforded the opportunity to work in an environment free of sexual harassment. The Company will not tolerate any behavior that amounts to sexual harassment. No Employee, either male or female, should be subjected verbally or physically to unsolicited and unwelcome sexual overtures or conduct.

The Company is responsible for preventing sexual harassment in the workplace, for taking immediate corrective action to stop sexual harassment in the workplace, and for promptly investigating any allegation of work-related sexual harassment. Any Employee found to have committed sexual harassment shall be subjected to appropriate disciplinary action.

IV. DISTRIBUTION

This Policy shall apply to all Directors, Consultants and Employees of the Company.

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V. POLICIES AND STANDARDS

A. When Sexual Harassment is Committed

The Company has adopted, and its policy is based on, the definition of Sexual Harassment set forth in *Section 3 of Republic Act No. 7877*. It provides that Sexual Harassment in the workplace is committed by an employer, employee, manager, supervisor, agent of the employer, or any other person who, having authority, influence or moral ascendancy over another in a work environment, demands, requests or otherwise requires any sexual favor from the other, regardless of whether the demand, request or requirement for submission is accepted by the object of said act.

In a work-related or employment environment, Sexual Harassment is committed when:

1. the sexual favor is made as a condition in the hiring or in the employment, re-employment, or continued employment of an individual, or in granting said individual favorable compensation, terms of conditions, promotions, or privileges; or the refusal to grant the sexual favor results in limiting, segregating or classifying the Employee which in any way would discriminate, deprive or diminish employment opportunities or otherwise adversely affect said Employee;
2. the above acts would impair the Employee's rights or privileges under existing labor laws; or
3. the above acts would result in an intimidating, hostile, or offensive environment for the Employee.

B. Where Sexual Harassment Can Be Committed


Sexual Harassment may be committed in any work or training environment, which may include, but are not limited to the following:

0. In or outside the office building or training site;
1. At the office or in training-related social functions;
2. In the course of work assignments outside the office;
3. At work-related conferences, studies or training sessions; or
4. During work-related travel.

C. Forms of Sexual Harassment

Sexual Harassment may take many forms. It may be subtle or indirect, or blatant or overt. It may be physical, verbal or visual in nature. Sexual Harassment acts may include, but are not limited to, the following:

1. Overt sexual advances;
2. Unwelcome or improper gestures of affection;
3. Request or demand for sexual favors including, but not limited to, going out on dates, outings, or the like for the same purpose;

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4. Making obscene phone calls or in person communications with sexual innuendos;
5. Sending obscene messages through Short Message Service or through different messaging applications;
6. Directing or inducing another to commit any act of sexual harassment, or cooperating in its commission, without which it would not have been committed; and
7. Any other act or conduct of a sexual nature or for purposes of sexual gratification which is generally annoying, disgusting or offensive to the victim.

D. Filing of a Report on or Complaint for Sexual Harassment

Information or report on, or complaint for, Sexual Harassment shall be filed with the HR.

E. Investigation and Proceedings on a Report on or Complaint for Sexual Harassment

The Committee on Decorum and Investigation (the "Committee"), composed of representatives from management and the Employees' unions, in coordination with the HR and Legal and Regulatory Affairs shall investigate on the report on, or complaint for, sexual harassment. Rules and procedures on administrative proceedings shall be implemented, as applicable.

F. Education and Training

All Directors, Consultants and Employees shall undergo periodic education and training on gender awareness and sensitivity, and prevention of sexual harassment. The HR, in coordination with the Committee, shall spearhead the implementation of the relevant training programs and activities.

VI. VIOLATIONS OF THIS POLICY

Any violation of this Policy will merit the imposition of appropriate disciplinary action and legal action, as may be necessary.

Any officer or Employee found to have committed Sexual Harassment or failed to comply with his responsibility to disclose knowledge of the information shall be subjected to disciplinary action, in accordance with the Maynilad Employee Handbook and Standards of Discipline. Such disciplinary action may include termination of employment and forfeiture of all benefits.

Retaliation or reprisal against anyone who has lodged a concern, report or complaint related to Sexual Harassment shall be considered as a violation of the Policy.

VII. MONITORING AND REVIEW

The HR and the Internal Audit Department of Enterprise Risk Management and Internal Audit Division shall periodically review compliance with and/or effectiveness of this Policy, and recommend the necessary or appropriate changes thereto.