Gender Equality, Inclusion, and Anti-Harassment Policy

Manāra Policy & Practice (Private) Limited

CUIN: 0321127 | Version 1.0 | Approved: 27 February 2026

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Policy Owner	Chief Executive Officer
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Domestic Legal Framework

Constitution of Pakistan, 1973 (Art. 25 — equality of citizens; Art. 27 — safeguard against discrimination in service; Art. 34 — full participation of women in national life) • Protection Against Harassment of Women at the Workplace Act, 2010 (amended 2022) • Transgender Persons (Protection of Rights) Act, 2018 • Companies Act, 2017 • Punjab Protection of Women Against Violence Act, 2016

International Standards and Frameworks

Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), 1979 • ILO Convention No. 100 (Equal Remuneration), 1951 • ILO Convention No. 111 (Discrimination in Employment), 1958 • ILO Violence and Harassment Convention (No. 190), 2019 • UN Sustainable Development Goals (SDG 5, SDG 10)

Donor and Client Standards (where applicable)

UN Women Quality Standards for Gender-Responsive Programmes • USAID Gender Equality and Women's Empowerment Policy (2023) • FCDO International Development Gender Equality Act obligations • GIZ Gender Mainstreaming Standards • Core Humanitarian Standard, Commitment 4

Why This Policy Exists

There are three reasons this Policy exists, and all three matter equally.

The first is legal. Under the Protection Against Harassment of Women at the Workplace Act, 2010 (amended 2022), Manāra is legally required to maintain a formal complaints mechanism, to constitute an Inquiry Committee, and to make the provisions of the Act available to everyone who works with the firm. These are not aspirational commitments that a progressive organisation voluntarily adopts. They are legal obligations that apply to every employer in Pakistan regardless of size. Non-compliance creates personal liability for both Directors.

The second is credibility. Manāra advises governments, donors, and civil society organisations on gender equality, social equity, and inclusive policy design. We conduct research with communities facing gender-based discrimination. We design gender-responsive frameworks and inclusive facilitation processes. We recommend governance standards to our clients. A firm that does not govern itself by those standards is not credible.

The third is practical. USAID, FCDO, UN Women, and GIZ require their suppliers and partners to demonstrate anti-harassment policies and gender equality commitments. This Policy meets those requirements and it is applied in practice.

This Policy covers two distinct domains that belong in the same document. The first is internal conduct: how everyone at Manāra treats each other, and how the firm responds when that standard is not met. The second is external practice: how Manāra integrates gender equality and inclusion into its research, advisory, and facilitation work. Manāra commits to both.

2. Scope and Application

This Policy distinguishes between two categories of persons: those who are bound by it as potential respondents, and those who are protected by it as potential complainants. The distinction matters because Manāra's ability to take action depends on whether it has an institutional relationship with the respondent. It can investigate and sanction a Director, team member, or contracted collaborator. It cannot impose the same process on a third party with no agreement with the firm.

2.1 Persons Bound by This Policy as Respondents

The following persons are bound by this Policy in all their conduct connected to Manāra's work, and are subject to Manāra's complaints and inquiry process:

- Both Directors, in all professional capacities.
- All core team members engaged on a fixed or continuing basis.
- All independent collaborators, associate consultants, expert advisors, field enumerators, interpreters, translators, and subcontractors engaged under a Consultant and Collaborator Agreement or equivalent written instrument.

These persons are bound from the commencement of their engagement with Manāra until its formal conclusion. The obligations relating to conduct toward colleagues, research participants, and the public continue for as long as the person represents or has recently represented Manāra in any

capacity. All persons in this category must receive this Policy before commencing work. Receipt is confirmed through the Consultant and Collaborator Agreement.

2.2 Persons Protected by This Policy as Complainants

The following persons may bring a complaint under this Policy, though the nature of Manāra's response will differ depending on who the respondent is and what remedy is available:

- Any person bound by Section 2.1 above — these persons have full access to the inquiry process regardless of who the respondent is.
- Research participants, beneficiaries, and community members engaged in Manāra-led or Manāra-affiliated research or field activities — these persons are protected under this Policy and under the Research Ethics and Data Protection Policy. Where their complaint concerns a person bound by Section 2.1, the full inquiry process applies. Where it concerns a third party, Manāra's response is to protect the participant and refer the matter appropriately.
- Participants in Manāra-convened events, workshops, and The Caravanserai gatherings, for the duration of and in direct connection with those events — Manāra is responsible for the conduct of its events and will act where conduct by a person bound by Section 2.1 is reported. Complaints about the conduct of other event participants are assessed case by case under the jurisdiction framework in Section 3.

A member of the general public who is not in any of the above categories is not a complainant under this Policy. However, conduct by a person bound by Section 2.1 that comes to Manāra's attention and crosses the threshold described in Section 3 may be assessed by Manāra proactively, without a formal complaint having been received.

2.3 Settings Covered

The obligations under this Policy extend to conduct in the following settings, regardless of whether the platform or location is owned or controlled by Manāra:

- Manāra's workspace, whether physical or virtual.
- Field research settings, client premises, and venues used for Manāra events and activities.
- Professional travel undertaken for Manāra purposes.
- Digital communications in a professional context connected to Manāra work. This includes: platforms used for project coordination (email, messaging applications, video conferencing), professional social media communications where the person is identifiable as a Manāra associate, and group channels used for Manāra project work even if hosted on personal accounts or non-Manāra platforms. The test is not which platform is used. The test is whether the communication occurs in a context connected to Manāra's work or the person's role within it.

3. Jurisdiction and Action Thresholds

Manāra's obligation to act, and what it can do, depends on who the respondent is and the nature of the conduct. This section defines that framework clearly so that the scope of this Policy is neither too narrow to be meaningful nor so broad that it claims authority Manāra does not have.

3.1 Respondent Is a Director, Team Member, or Contracted Collaborator

Where the respondent is a person bound by Section 2.1, Manāra has full jurisdiction. The full complaints and inquiry process in Section 7 applies. Manāra may investigate, make findings, and impose outcomes including formal warning, restriction, suspension, or termination of the professional relationship. This is the primary jurisdiction of this Policy.

3.2 Respondent Is a Client, Event Participant, or Other Third Party with No Agreement with Manāra

Where the respondent is a client, partner, funder, event participant, or other third party with no contractual relationship with Manāra, Manāra cannot investigate or sanction the respondent directly. Manāra's obligation in these cases is to protect the person who has been affected, not to adjudicate between the parties. The Policy Owner will: acknowledge the complaint, assess the situation, take immediate practical steps to protect the affected person (which may include removing them from contact with the respondent, adjusting working arrangements, or withdrawing Manāra from the engagement), and consider whether to raise the matter formally with the third party's organisation or refer it to an appropriate authority. The formal inquiry process does not apply to third-party respondents.

3.3 Conduct Against a Member of the Public That Comes to Manāra’s Attention Without a Formal Complaint

Where conduct by a person bound by Section 2.1 comes to Manāra's attention through any channel, and that conduct has affected a member of the public who has not brought a complaint to Manāra, Manāra applies a two-part threshold test to determine whether to act proactively:

- First: is the conduct sufficiently serious that a reasonable person would consider it incompatible with continued association with Manāra? And,
- Second: does the conduct involve potential criminal liability, harm to a minor, abuse of a professional position, or conduct that directly implicates Manāra's institutional reputation or the values stated in this Policy?

Where both conditions are met, the Policy Owner initiates an assessment under this Policy regardless of whether a formal complaint has been received. An allegation of sexual harassment involving a minor, for example, meets both thresholds without ambiguity and will be assessed as a serious conduct matter, with legal counsel engaged promptly given the potential criminal dimension. The fact that the victim has not approached Manāra does not prevent internal action.

Where the conduct does not meet both thresholds, it falls outside Manāra's jurisdiction under this Policy. Personal disputes, political disagreements, and defamation matters between individuals that have no connection to Manāra's work or the person's role within it are not grounds for action under this Policy, even if they become publicly visible. Manāra does not position itself as an arbiter of its collaborators' personal lives or online activity outside the professional context.

Borderline cases are assessed by the Policy Owner in consultation with the other Director. The assessment, the reasoning, and the decision are documented in the governance file.

4. Core Commitments

Manāra makes the following commitments. They are not aspirational. They describe the minimum standard of conduct expected of everyone operating under Manāra's name.

4.1 Equal Treatment and Non-Discrimination

Manāra does not discriminate on the basis of gender, marital or family status, pregnancy or parenting responsibilities, age, ethnicity, religion, disability, national origin, language, socioeconomic background, or transgender status as recognised under the Transgender Persons (Protection of Rights) Act, 2018. This applies to the engagement of collaborators, the allocation of work and leadership roles, remuneration for equivalent contributions, access to development and learning opportunities, and every other professional decision. These categories are not exhaustive. The principle extends to any characteristic that is used to treat a person less favourably without legitimate justification.

4.2 Zero Tolerance for Harassment

Manāra maintains zero tolerance for all forms of harassment, including sexual harassment, gender-based harassment, bullying, intimidation, and the creation of a hostile professional environment. Zero tolerance means that every reported incident is taken seriously, assessed, and responded to through the formal process in this Policy. It does not mean that every allegation results in a predetermined finding. It means that no allegation is dismissed, minimised, or managed informally when the complainant has requested a formal response.

4.3 Equitable Remuneration

Manāra pays team members and collaborators equitably for equivalent work. Gender, ethnicity, and other protected characteristics play no role in remuneration decisions. Where different collaborators are engaged at different rates, the difference reflects documented factors: scope of work, seniority, specialisation, and market rate for the specific skill set. These factors are applied consistently. The Policy Owner maintains records sufficient to demonstrate that remuneration decisions are grounded in these factors.

4.4 Safe Reporting

Manāra ensures that anyone who experiences or witnesses harassment, discrimination, or a violation of this Policy can report it safely, without fear of retaliation, and with confidence that the report will be handled confidentially and acted on. The complaints process in Section 8 is designed to make this possible. The prohibition on retaliation in Section 8.3 is absolute.

4.5 Inclusive Professional Culture

Manāra actively works to maintain a professional environment where all people feel respected, valued, and able to contribute their best work. This applies to how meetings are facilitated, how credit and attribution are managed in knowledge products and project outputs, how workloads are allocated, and how Manāra's leadership communicates with team members and collaborators. Inclusion is an active practice, not the absence of exclusion.

5. Definitions

The following definitions apply throughout this Policy. They are grounded in the Protection Against Harassment of Women at the Workplace Act, 2010 (amended 2022) and in international standards.

5.1 Sexual Harassment

Any unwelcome conduct of a sexual nature, whether verbal, non-verbal, written, digital, or physical, that has the purpose or effect of creating an intimidating, hostile, or offensive professional environment, or that conditions any work opportunity or decision on submission to such conduct. Examples in Manāra's operating context include:

- Unwanted physical contact of any kind, including touching, grabbing, or blocking movement.
- Sexual comments, jokes, propositions, or insinuations, whether made in person, in meetings, or through digital channels.
- Sharing or displaying explicit, sexual, or degrading material through any channel.
- Repeated unwanted communication of a romantic or personal nature after the person has indicated it is unwelcome.
- Demands or implied demands for sexual favours in exchange for work opportunities, positive treatment, or continued engagement.

5.2 Gender-Based Harassment

Conduct that demeans, belittles, excludes, or discriminates against a person on the basis of their gender, gender identity, or gender expression, even where it is not explicitly sexual in nature. Examples: persistent demeaning remarks about a person's competence based on gender stereotypes; excluding a person from professional decisions or opportunities on the basis of gender; deliberately and repeatedly misgendering a person after being corrected.

5.3 Hostile Work Environment

A professional environment in which harassment is sufficiently severe or pervasive to alter the conditions of a person's participation, even if no single incident is extreme. A pattern of microaggressions, repeated minor exclusions, or sustained demeaning behaviour can constitute a hostile work environment even where each individual incident appears minor in isolation. The test is the cumulative effect on the person affected, not the intent of the person whose conduct is in question.

5.4 Discrimination

Treating a person less favourably than another in comparable circumstances on the basis of a protected characteristic, as described in the Core Commitments (Section 4). Discrimination may be direct (explicitly linked to the characteristic) or indirect (a policy or practice that appears neutral but has a disproportionate adverse effect on persons with a particular characteristic).

5.5 Retaliation

Any adverse action taken against a person because they made a complaint, participated in an inquiry as a witness, or supported a complainant. Adverse action includes: terminating an engagement, reducing work allocation, providing a negative reference, excluding from professional opportunities,

or any other act that disadvantages the person in connection with their professional relationship with Manāra. Retaliation is a violation of this Policy and of the law, regardless of the outcome of the original complaint.

5.6 Complainant and Respondent

The complainant is the person who has reported an incident of harassment or discrimination. The respondent is the person against whom the complaint has been made. Both parties have rights under this Policy: the complainant has the right to a fair, confidential, and prompt process; the respondent has the right to know the substance of the complaint and to respond to it before any finding is made.

6. Prohibited Conduct

The following conduct is prohibited under this Policy for all persons bound by Section 2.1. The examples given are illustrative, not exhaustive.

6.1 Sexual and Gender-Based Harassment

- Any unwanted physical contact.
- Sexual comments, jokes, or propositions in any setting or through any channel.
- Persistent unwanted personal attention of a romantic or sexual nature.
- Degrading or demeaning remarks based on a person's gender or transgender status.
- Sharing explicit, sexual, or degrading content through any channel connected to Manāra's work.

6.2 Digital and Remote Conduct

For a remote-first firm, a significant portion of professional interaction occurs through digital channels. The test for whether conduct falls within this Policy is not which platform was used. It is whether the conduct occurred in a context connected to Manāra's work or the person's role within it. Conduct through a personal social media account, a private messaging application, or any other non-Manāra platform is covered by this Policy if it is directed at a colleague, research participant, or other person in connection with Manāra work, or if the person is identifiably acting as a Manāra associate.

The following are prohibited regardless of platform or setting:

- Sending unwanted messages of a sexual, romantic, or personally intrusive nature through any digital channel to a colleague, collaborator, or research participant.
- Making sexual, demeaning, or hostile comments in virtual meetings, group chats, project coordination channels, or professional social media.
- Sharing another person's private images, communications, or personal information without their consent.
- Sustained hostile, intimidating, or humiliating online conduct directed at a colleague or person connected to Manāra's work.
- Creating or contributing to group communications, threads, or forums that demean colleagues, research participants, or communities that Manāra works with.

Personal disputes, political disagreements, and defamation matters between individuals that have no connection to Manāra's work or institutional interests are outside the scope of this Policy. Manāra does not regulate the personal online conduct of its collaborators where it has no bearing on the firm's work, its people, or the communities it serves.

6.3 Abuse of Authority

- Using a position of authority as a Director, Project Lead, or senior team member to solicit personal or sexual favours from a collaborator or team member.
- Conditioning work opportunities, positive references, continued engagement, or payment on personal compliance.
- Retaliating against a person who declines advances, raises concerns, or makes a complaint.

6.4 Discrimination in Professional Decisions

- Making engagement, assignment, remuneration, referral, or advocacy decisions on the basis of gender, gender identity, sexual orientation, or other protected characteristic rather than professional merit and scope.
- Applying different standards to equivalent work or conduct on the basis of a protected characteristic.

6.5 Creating a Hostile Environment

- Sustained conduct that makes a person's professional participation uncomfortable, unsafe, or degrading, even where individual incidents appear minor.
- Persistent microaggressions, deliberate exclusion from professional conversations, or repeated undermining of a person's contributions.
- Facilitating or encouraging others to engage in the conduct described in this section.

7. The Inquiry Committee

The Inquiry Committee is constituted by Manāra in compliance with the Protection Against Harassment of Women at the Workplace Act, 2010 (amended 2022). Its purpose is to receive complaints under this Policy, conduct fair and confidential inquiries, make findings of fact, and recommend appropriate outcomes to the Directors.

7.1 Constitution and Composition

Because Manāra has only two Directors, and because either may be the respondent in a complaint, the Inquiry Committee is constituted on a complaint-by-complaint basis from a standing pool of designated members. Three rules govern its constitution in every case.

Rule 1 — Absolute exclusion of the accused. A Director who is the respondent in a complaint, or who is under proactive assessment under Section 3.3, has no role whatsoever in the constitution, instruction, or conduct of the Inquiry Committee for that matter. They are not informed of the inquiry's progress, do not have access to working documents or testimony, and receive the Committee's

report only at the point that both the complainant and the respondent are notified of the outcome. This is not a procedural courtesy. It is a condition of the inquiry's integrity.

Rule 2 — Gender composition. Every Inquiry Committee must include at least one woman. This requirement reflects the nature of the complaints this Policy addresses and the importance of the Committee being constituted in a way that is credible to the complainant. Where the standing pool cannot yield a committee that includes at least one woman, the external independent member or an additional external member appointed for that inquiry must be a woman. The Committee is not validly constituted until this requirement is met.

Rule 3 — Independence where a Director is accused. Where the complaint involves one or both Directors, the majority of the Committee must be persons external to Manāra who have no current or recent professional relationship with the accused Director.

Scenario	Inquiry Committee Composition
Complaint does not involve either Director	One Director (as Chair) + one designated senior collaborator + one designated external independent member. At least one member must be a woman.
Complaint involves one Director	The other Director (as Chair) + designated external independent member + one additional external member. The accused Director is excluded entirely. At least one member must be a woman.
Complaint involves both Directors	External independent member (as Chair) + two additional external members, appointed by the Chair in consultation with the complainant. No internal Manāra member sits on the Committee. At least one member must be a woman.

The designated senior collaborator and the designated external independent member are appointed annually by both Directors before any complaint arises. Their names and contact details are recorded in the governance file and shared with all team members and collaborators as part of this Policy's distribution. The designations are renewed annually. In making the annual designations, both Directors must ensure that the standing pool as a whole includes at least one woman, so that the gender composition requirement can be met without delay when a complaint is received.

7.2 Mandate and Powers

The Inquiry Committee's mandate is to conduct a fair, impartial, and confidential inquiry into the complaint; to interview the complainant, the respondent, and any witnesses; to review documentary evidence; and to produce a written report with findings of fact and a recommended outcome. The Committee does not impose outcomes. It makes recommendations that the Directors implement. Where the respondent is a Director, the remaining Director implements the recommendation after reviewing the report. Where both Directors are respondents, implementation of the recommendation is managed by the external Chair of the Committee, who may engage legal counsel to advise on execution.

All persons interviewed or asked to provide evidence must cooperate fully with the Inquiry Committee. Failure to cooperate is itself a conduct matter under this Policy. The Committee may seek external legal or expert input on specific questions during an inquiry.

7.3 Timelines

The Inquiry Committee completes its inquiry and delivers its written report within 30 working days of a complaint being formally received. Any extension beyond 30 days requires the documented agreement of both the complainant and the Committee Chair. Extensions are the exception and must be justified by specific circumstances, not administrative convenience.

8. Complaints Process

This section applies to complaints where the respondent is a person bound by Section 2.1. It is written so that anyone who has experienced harassment or discrimination knows exactly what to do and what to expect.

Step	Stage	What happens
1	**Reporting**	A complaint may be made verbally or in writing to the Policy Owner (CEO). Where the complaint involves the CEO, it is made to the other Director. Where it involves both Directors, it is made directly to the designated external independent member. Use the Complaint Form (Annex A) or contact the relevant person directly. A complainant does not need to have everything documented perfectly to initiate the process.
2	**Acknowledgement**	The Policy Owner (or receiving Director or external member, as applicable) acknowledges receipt within two working days, confirms confidentiality, and provides the complainant with information on the process and expected timelines.
3	**Preliminary assessment**	Within five working days, the Policy Owner determines whether the matter falls within the scope of this Policy and whether a formal inquiry is required. If informal resolution is appropriate and the complainant agrees, it may proceed informally. The complainant always retains the right to request a formal inquiry regardless.
4	**Inquiry**	The Inquiry Committee is constituted in accordance with Section 6.1. Both parties are heard separately. Neither is present during the other's interview. Witnesses are interviewed. Documentary evidence is reviewed. The accused Director, where applicable, is not informed of the inquiry's progress or given access to working documents until the report is finalised.
5	**Findings and recommendation**	The Committee produces a written report with findings of fact and a recommended outcome within 30 working days. Possible recommendations include: no action, informal resolution, formal warning, restriction of engagement, suspension, or termination of the professional relationship with Manāra.
6	**Decision**	The non-accused Director (or external Chair, where both Directors are respondents) implements the Committee's recommendation. Where there is documented reason to depart from it, that reason is recorded. Both parties are notified of the outcome in writing.
7	**Appeal**	Either party may appeal within 10 working days of the decision notification. The appeal is considered by the external independent member or another external member not previously involved in the inquiry. The appeal decision is final within Manāra's internal process.

8.1 Interim Measures

From the point a formal inquiry is initiated, the Policy Owner may implement interim measures to protect the complainant's professional environment pending the outcome. These may include: temporary adjustment of working arrangements, supervised or structured contact between parties, or temporary suspension of the respondent's engagement on shared projects. Interim measures are not a finding of guilt and do not prejudge the outcome of the inquiry.

8.2 Confidentiality

All persons involved in the complaints process, including the Policy Owner, Inquiry Committee members, and witnesses, are bound by confidentiality regarding the complaint, the parties, and the inquiry process. Breach of confidentiality is itself a violation of this Policy. Confidentiality does not prevent Manāra from complying with any legal obligation to report or refer a matter to an external authority. It does not prevent the complainant or the respondent from seeking independent legal advice.

8.3 No Retaliation

Any retaliation against a complainant, witness, or person who has supported a complainant is a violation of this Policy and will be treated as a separate act of misconduct. Retaliation may be formal (adverse professional decisions) or informal (exclusion, hostility, or undermining in any form). Both are prohibited. The Policy Owner monitors actively for retaliation throughout and after the complaints process.

9. External and Legal Remedies

Manāra's internal process does not limit, replace, or extinguish any person's rights under Pakistani law or international frameworks. A complainant may, at any time and regardless of whether the internal process has been initiated or completed:

- Report the matter to the Federal Ombudsperson Secretariat for Protection Against Harassment at the Workplace (www.mohtasib.gov.pk).
- Report the matter to the relevant provincial Ombudsperson: the Punjab Ombudsperson for Protection Against Harassment of Women at the Workplace; the Sindh Ombudsperson; or the equivalent authority in the relevant province.
- File a complaint with the National Commission on the Status of Women (NCSW).
- Pursue remedies under the Pakistan Penal Code or any other applicable law.
- Seek independent legal advice at any stage.

Manāra will not discourage, prevent, penalise, or otherwise impede any person from exercising these rights. Doing so would itself constitute retaliation under this Policy and a violation of the law.

10. Gender Equality and Inclusion in Manāra’s Work

This section addresses the external dimension of Manāra's commitment: how gender equality and inclusion are integrated into its research, advisory, and facilitation practice. It is what makes this Policy distinctive to Manāra's positioning, and it reflects the firm's obligation to align its internal standards with its external advisory work.

10.1 Gender-Responsive Research Design

Manāra integrates gender analysis into its research design as a standard practice, not an optional add-on. In practice, this means: disaggregating data by gender where relevant and feasible; examining whether a policy question affects women, men, non-binary, and transgender persons differently; identifying and addressing gender-specific barriers to research participation; and designing data collection processes that do not reproduce or reinforce gender inequalities. Research that is silent on gender when gender is a relevant variable is incomplete research.

10.2 Inclusive Facilitation

Manāra's facilitation practice actively creates conditions for equitable participation. This includes: designing session formats and participation methods that accommodate different communication styles and power dynamics; attending explicitly to whose voices are amplified and whose are marginalised in group processes; ensuring that workshop documentation, summaries, and publications attribute contributions equitably; and selecting venues, times, and formats that do not exclude participants with care responsibilities or mobility constraints. Inclusion in facilitation is not achieved by announcing it. It requires deliberate design.

10.3 Gender-Sensitive Communication

Manāra's knowledge products use inclusive language and avoid gender stereotyping. Research findings that have different implications for different gender groups are presented with that differentiation clearly shown, not collapsed into gender-neutral language that obscures inequality. Manāra does not produce advocacy or communication work that reproduces harmful gender norms, even where a client requests it. Where a client's brief conflicts with this standard, the Project Lead raises it with the CEO, who discusses the matter with the client.

10.4 Collaborator Selection and Team Composition

Manāra actively seeks gender diversity and inclusion in its collaborator network. When assembling a project team, the Policy Owner and Project Lead consider the team's composition, including whether it reflects relevant lived experience alongside technical expertise, and whether it is representative of the communities and contexts the project concerns. This is not a quota system. It is an active practice of looking deliberately beyond the default professional network, which tends to reproduce existing inequalities if left unexamined.

10.5 Client and Partner Conduct

Where Manāra is engaged by a client or partner whose conduct during a project is inconsistent with the standards in this Policy, including where a client creates a hostile or discriminatory environment for Manāra's team members during fieldwork, facilitation, or meetings, the Project Lead escalates the matter to the CEO immediately. The CEO addresses the matter directly with the client. Manāra does not require its team members to tolerate harassment or discrimination from clients or partners as a condition of project delivery.

10.6 Inclusion Beyond Gender

Gender is the primary axis addressed in this Policy, anchored by a specific legal obligation. But exclusion in research, advisory, and facilitation work operates across multiple dimensions simultaneously. A session designed for gender equity that is inaccessible to a participant with a mobility impairment has not achieved inclusion. A research instrument that disaggregates by gender but is administered only in English in a mixed-literacy community has not achieved inclusion. Manāra's commitment to inclusion extends to the following dimensions, each with practical implications for how work is designed and delivered.

Disability inclusion. Manāra designs its research and facilitation activities to be accessible to persons with disabilities to the extent practicable given the project context. In practice this means: considering physical accessibility when selecting field research venues and event spaces; offering alternative participation formats (written submission, one-to-one interview, remote participation) where group settings create barriers; using plain language and avoiding visual-only data presentation in materials; and not excluding persons with disabilities from research participation on the basis of assumed incapacity to consent or contribute. Where a project specifically concerns communities that include persons with disabilities, the research design must account for that explicitly.

Language and literacy inclusion. Pakistan's research and policy contexts involve multiple languages, scripts, and literacy levels. Manāra does not treat English as a neutral default. Where a research instrument, facilitation process, or knowledge product is intended to reach or involve communities whose primary language is not English or Urdu, translation and adaptation are treated as design requirements, not afterthoughts. Consent processes, in particular, must be conducted in the participant's own language and at an appropriate literacy level. Where oral communication is more appropriate than written, that is the mode used. Outputs intended for professional audiences should be clearly distinguished from outputs intended for community audiences, with the latter adapted accordingly.

Socioeconomic inclusion in participation design. Participation in Manāra's events, consultations, and research activities should not be structurally limited to those with resources, networks, or institutional affiliations. For The Caravanserai and similar convenings, this means being deliberate about who is invited and through what channels, covering participation costs where necessary, selecting times and formats that do not exclude people in informal employment or with care responsibilities, and ensuring that the framing and language of an event does not signal that it is only for a professional elite. For field research, it means ensuring that remuneration for participation is fair and that transportation, childcare, or other practical barriers are addressed where the project budget allows.

Ethnicity, religion, and minority inclusion. Where Manāra's work concerns or involves communities defined by ethnicity, religion, caste, or minority status, the research design, team composition, and facilitation approach must reflect that context. This includes ensuring that data is disaggregated along relevant dimensions, that community members are involved in shaping research questions where appropriate, and that findings are not reported in ways that reinforce stereotypes or expose communities to harm. Manāra does not produce analysis that attributes group characteristics in ways that are reductive or that serve to stigmatise.

Transgender persons. Transgender persons in Pakistan face compounding forms of marginalisation: social stigma, limited access to formal employment and services, barriers to participation in institutional settings, and frequent exclusion from research that concerns the communities they are part of. The Transgender Persons (Protection of Rights) Act, 2018 establishes their legal status and basic protections. Manāra's obligation under this Policy and under that law is to treat transgender persons with dignity in all professional interactions, to ensure they are not excluded from research participation or Manāra-convened events on the basis of their status, and

where a project concerns communities in which transgender persons are present, to consider explicitly how the research design accounts for their participation and whether findings are reported in ways that reflect their experience rather than rendering them invisible. This is a question of marginalisation and equity, consistent with Manāra's broader research ethics commitments.

These commitments do not require Manāra to achieve perfect inclusion in every project under every constraint. They require Manāra to consider these dimensions at the design stage, to document where constraints prevent full implementation, and to ensure that exclusion is a deliberate and justified decision rather than an oversight. The Project Lead is responsible for inclusion considerations at project design and the CEO reviews them as part of quality assurance.

10. Display and Communication Requirements

The Protection Against Harassment of Women at the Workplace Act, 2010 (amended 2022) requires employers to display the provisions of the Act in a conspicuous place in the workplace. Manāra is a remote-first firm. This statutory obligation is met through the following measures:

- This Policy is published in full on Manāra's public website (www.manarapolicy.com) and is accessible at all times.
- All team members and collaborators receive this Policy before commencing any work with Manāra. Receipt is confirmed through the Consultant and Collaborator Agreement.
- The Complaint Form (Annex A) and the contact details of the Policy Owner, the designated senior collaborator, and the designated external independent member are shared with all team members and collaborators at onboarding and updated annually.
- The existence of the Inquiry Committee and the name and contact of the designated external independent member are communicated to all team members in Manāra's internal communications space and updated whenever the designation changes.

These measures collectively fulfil the display and communication requirement for a remote-first professional services firm. They are reviewed annually as part of the policy review cycle.

11. Governance and Review

This Policy is approved by the Directors of Manāra Policy & Practice (Private) Limited, Maliha Shah and Ahmad Nadeem, and is recorded in the Directors' Resolutions register of the company. It enters into force on the date of the Directors' resolution and supersedes any prior guidance on workplace conduct, harassment, or gender equality within the organisation.

This Policy will be reviewed annually by the Policy Owner and presented to both Directors for reaffirmation or amendment. An interim review will be triggered by: a harassment or discrimination complaint and its resolution; a material change in the composition or scale of Manāra's team and collaborator network; any amendment to the Protection Against Harassment of Women at the Workplace Act, the Transgender Persons (Protection of Rights) Act, or related legislation; or a material change in donor requirements on gender equality, safeguarding, or anti-harassment.

The annual review will include: confirmation that the designated senior collaborator and external independent member remain in post and available; review of any complaints received or resolved in

the period; and assessment of whether the policy remains adequate for Manāra's operating context. The Policy Owner reports to both Directors on these matters annually.

12. Related Documents

- Code of Ethics and Professional Conduct v1.0
- Research Ethics and Data Protection Policy v1.0
- Financial Management and Internal Controls Policy v1.0
- Consultant and Collaborator Agreement Template
- Complaint Form (Annex A to this Policy)

Directors' Resolution and Approval

We, the Directors of Manāra Policy & Practice (Private) Limited (CUIN: 0321127), having reviewed the Gender Equality, Inclusion, and Anti-Harassment Policy Version 1.0, hereby approve this Policy and resolve that it shall enter into force with immediate effect from the date of our signatures below. This resolution is recorded in the Directors' Resolutions register of the company.

Approved by **Maliha Shah** Chief Executive Officer & Founder Signature: *Approved electronically* Date: 27 February 2026	**Approved by** **Ahmad Nadeem** Director & Co-Founder Signature: *Approved electronically* Date: 27 February 2026

ANNEX A

Complaint Form

Manāra Policy & Practice (Private) Limited

This form may be used to formally record a complaint under the Gender Equality, Inclusion, and Anti-Harassment Policy. You do not need to complete the form perfectly to initiate the process. An initial report made verbally or in writing is sufficient. The form creates a formal record that supports a fair and structured inquiry. It may be submitted anonymously for information only; a formal inquiry cannot proceed without the complainant's identity being known to the Inquiry Committee.

Part 1 — Complainant Details

Full Name	(May be left blank for anonymous submission)
Role / Position	
Contact (email or phone)	(For communication during the process)
Date of Complaint	

Part 2 — Incident Details

What happened?	(Describe in your own words. Include as much detail as you are comfortable providing.)
When did it happen?	(Date(s) and approximate time)
Where did it happen?	(In person, virtual meeting, written message, email, social media, etc.)
Who was involved?	(Name(s) of respondent(s))
Were there witnesses?	(Names and contact details, if known)
Has this happened before?	☐ Yes — describe the pattern below ☐ No
Is there documentary evidence?	(Messages, emails, recordings — do not attach originals here. Note that they exist and describe them briefly.)

Part 3 — Prior Steps

Has this been raised informally?	☐ Yes — with whom, and what was the response? ☐ No
Has it been reported externally?	☐ Yes — to which body? ☐ No

Part 4 — Outcome Sought

What would you like the process to achieve? There is no required or correct answer. This field helps the Inquiry Committee understand your priorities.

_____

_____

_____

Part 5 — Confidentiality Acknowledgement

☐ **I understand the confidentiality terms of this process.**

I understand that my identity will be disclosed to the Inquiry Committee and, as necessary for a fair inquiry, to the respondent. It will not be disclosed further without my consent, except where Manāra is legally required to do so. I understand that all parties to the process are bound by the same confidentiality obligations.

Part 6 — Submission

Submit this form to the relevant contact below. You may submit by email or in person. You do not need to have the form fully completed to initiate the process.

Standard complaints (not involving CEO)	Maliha Shah, CEO | maliha@manarapolicy.com
Complaints involving the CEO	Ahmad Nadeem, Director | [director email]
Complaints involving both Directors	Designated External Independent Member | [name and contact — updated annually and communicated at onboarding]

Complainant (or 'Anonymous')	**Received by (Policy Owner or designee)**
Name: _____	Name: _____
Signature: _____	Signature: _____
Date: _____	Date: _____

Filing instruction: The completed form is retained securely by the Policy Owner. Access is restricted to the Inquiry Committee for the duration of the inquiry. Following resolution, the form is retained in the governance file for the period required by the Policy's record retention requirements.