

SEXUAL HARASSMENT POLICY

Flash Motors Company Limited

5-7 Orchard Road
Kingston 5,
St. Andrew,
Jamaica
info@flash-motor.com
www.flash-motors.com



4. Policy Statement	3
5. Reporting Procedure.....	3
6. Investigation and Resolution Process.....	3
7. Disciplinary Actions -Liability for Sexual Harassment/Sanctions	4
8. Confidentiality and Record Keeping.....	4
9. Training and Awareness	5
10. Retaliation	5
11. Roles and Responsibilities.....	5
12. Related Policies and References.....	5
13. Provisions of the Law.....	5
14. Review and Amendment	5
15. Document Control.....	6
Date.....	6
Effective Date	6
Board Approval Date	6
Section Change(s) Made	6
Jan 26	6
16. Appendices.....	6
Appendix A: Sexual Harassment Complaint Form.....	6
Appendix B: Supervisor/Investigator Guidance Checklist	6

This policy is established in accordance with the Sexual Harassment (Protection and Prevention) Act, 2021 of Jamaica, which provides the legal framework for preventing, reporting, and resolving incidents of sexual harassment in the workplace and other related environments.

The Company adopts a zero tolerance approach to sexual harassment and in this regard the Board of Directors of the Company has approved this Policy.

2. Scope

This Policy applies to:

- All officers, directors and employees of the Company, whether full-time, part-time, temporary, or probationary;
- All contractors, consultants, interns, and agents;
- All clients, vendors, and service providers who interact with the Company;
- Any individual present on Company premises or participating in Company-related events, including off-site functions, conferences, or social gatherings.

This Policy also covers incidents that occur outside the workplace but have a direct impact on the work environment, reputation, or safety of any employee.

3. Definitions

“Sexual Harassment” refers to any unwelcome or unwanted sexual advance, request for sexual favour, or other conduct of a sexual nature by one person towards another, whether verbal, non-verbal, physical, or digital, that:

- a) Interferes with an individual’s work performance or creates an intimidating, hostile, or offensive work environment;
- b) Is made a condition of employment, promotion, or benefit; or
- c) Causes humiliation, distress, or threat to personal dignity.

Examples include, but are not limited to:

- Inappropriate touching or physical contact;
- Sexual jokes, innuendoes, sexually coloured or suggestive remarks;
- Display or sharing of sexually explicit material;
- Persistent unwanted communication of a sexual nature;
- Requests for dates or sexual favours linked to employment decisions;

The workplace includes all Company premises, vehicles, digital platforms, and work-related events.

4. Policy Statement

- a) Flash Motors maintains a zero-tolerance position toward sexual harassment. Any employee or representative found to have engaged in such behaviour will be subject to disciplinary action, up to and including termination.
- b) All complaints will be treated with fairness, confidentiality, and sensitivity.
- c) Retaliation or victimization against a person who makes a report or participates in an investigation is strictly prohibited.
- d) The Company encourages early reporting to allow prompt and effective resolution.
- e) All persons in positions of authority are responsible for fostering a safe, respectful work culture and must take immediate action upon becoming aware of potential harassment.
- f) Sexual harassment can involve males or females being harassed by members of either gender. While sexual harassment typically involves a person in a position of higher authority as the harasser such as directors, managers and supervisors, the Company acknowledges that individuals in positions of lesser or equal authority can also be held responsible for engaging in conduct in contradiction of this Policy.
- g) Sexual Harassment can involve one or more incidents.

5. Reporting Procedure

1. Primary Reporting Authority: The Chief Executive Officer (CEO) shall serve as the first point of contact for all sexual harassment complaints.
2. Secondary Reporting Authority: In the event the complaint involves the CEO, or if the Complainant prefers, the Chief Financial Officer (CFO) shall serve as the alternate reporting authority.
3. Reports may be made verbally or in writing, using the Sexual Harassment Complaint Form (Appendix A).
4. Reports should include:
 - Name(s) of parties involved;
 - Date(s), time(s), and location(s) of incidents;
 - Description of the conduct;
 - Names of any witnesses or supporting evidence.
5. All complaints will be acknowledged in writing within five (5) working days of receipt.

5-7 Orchard Road
Kingston 5,
St. Andrew,
Jamaica
info@flash-motor.com
www.flash-motors.com



FARIZON



Level 2 – Formal Internal Investigation

- If the matter is not resolved informally or is deemed serious, a formal investigation will commence.
- The investigating officer will be appointed by the CEO (or CFO, where applicable) and will follow the Supervisor/Investigator Checklist (Appendix B) and may include a committee with legal personnel as required
- The investigation will include interviews with relevant parties, a review of evidence, and a written report with findings and recommendations.

Both Complainant and Respondent will have the opportunity to present information and respond to allegations.

Level 3 – Referral to the Tribunal

- If either party is dissatisfied with the Company’s handling or outcome, they may refer the matter to the Sexual Harassment Tribunal of Jamaica as provided under the Act.

The Company will cooperate fully with the Tribunal or any authorized investigating body.

7. Disciplinary Actions -Liability for Sexual Harassment/Sanctions

Where sexual harassment is proven, disciplinary action will be taken against person/persons found to be in breach of this Policy, they will be found liable for sexual harassment according to the severity and circumstances of the case. Possible disciplinary actions include but are not limited to:

- a) Verbal or written warning;
- b) Mandatory counselling or sensitivity training;
- c) Suspension without pay;
- d) Demotion or reassignment;
- e) Termination of employment or contract.

False or malicious complaints are a serious violation and may also result in disciplinary action. A person who is found to wilfully and knowingly bring forth a false claim of sexual harassment against another individual, shall be liable for a breach of this Policy and shall be reprimanded/disciplined accordingly.

8. Confidentiality and Record Keeping

- All complaints, investigations, and outcomes will be handled in strict confidence and shared only with those who have a legitimate need to know for the purpose of investigating complaints or

- and the Company's legal duties under the Act.
- The Company will conduct awareness campaigns to reinforce respectful workplace culture and employee rights.

10. Retaliation

- Acts of bullying, intimidation or threats against an employee who has reported an incident of alleged sexual harassment, or any employee who testifies, assists or participates in a proceeding, investigation or hearing relating to such allegations of sexual harassment (together “retaliatory acts”) shall be treated as acts of sexual harassment.
- Employees who believe they are/have been the subject of retaliatory acts shall report same in the manner provided for herein.

11. Roles and Responsibilities

- CEO: Policy owner and primary officer for receiving and managing complaints; ensures compliance and annual review.
- CFO: Alternate reporting officer and compliance deputy; maintains investigation records.
- Supervisors and Managers: Promote awareness, act promptly on reports, and model professional conduct.
- Employees and Contractors: Uphold this Policy and report any instances of harassment or retaliation.

12. Related Policies and References

This Policy should be read in conjunction with:

- Occupational Health and Safety Policy
- Sexual Harassment (Protection and Prevention) Act, 2021 (Jamaica)

13. Provisions of the Law

The procedures available under this Policy do not supersede any legal procedures or remedies otherwise available to a Complainant in the local civil or criminal jurisprudence.

14. Review and Amendment

This Policy shall be reviewed every two (2) years by the Board or as required by changes in Jamaican law or company structure. The Board must approve amendments before implementation.

Jan 26			

16. Appendices

Appendix A: Sexual Harassment Complaint Form

Complainant Information

Name: _____

Position/Department: _____

Contact Information: _____

Details of Incident

Date(s) of Incident(s): _____

Location(s): _____

Persons Involved (Respondent): _____

Description of Incident:

Witnesses (if any):

Desired Outcome / Action Requested:

Signature of Complainant: _____

Date: _____

Appendix B: Supervisor/Investigator Guidance Checklist

- Receive and acknowledge the complaint in writing within five (5) working days.
- Maintain strict confidentiality throughout the process.
- Conduct interviews with the complainant, respondent, and any witnesses.
- Review all documentation and physical or digital evidence.
- Keep detailed notes of all meetings and findings.
- Prepare a written report summarizing findings and recommended actions.
- Submit the report to the CEO (or CFO, if applicable) for review and decision.
- Communicate the outcome to both parties in writing.