

# Whistle Blowing Policy

## 1. Introduction

**1.1** Employees are often the first to realize that there may be something seriously wrong within the Company. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. They may also fear harassment or victimization. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

**1.2** The Company is committed to the highest possible standards of openness, probity and accountability. In line with that commitment, we encourage employees and others with serious concerns about any aspect of the Company's work to come forward and voice those concerns. It is recognized that certain cases will have to proceed on a confidential basis. This policy document makes it clear that employees can do something without fear of reprisals. This Whistle blowing Policy is intended to encourage and enable employees to raise serious concerns **within** the Company rather than overlooking a problem or blowing the whistle outside.

## 2. Aims and scope of this policy

**2.1** This policy aims to:

- To provide avenues for you to raise concerns and receive feedback on any action taken;
- allow you to take the matter further if you are dissatisfied with the Company's response;
- Re-assure you that you will be protected from reprisals or victimization for whistle blowing in good faith. Consideration will be given to redeployment if you request it.

**2.2** There are procedures in place to enable you to lodge a grievance relating to your own employment. This whistle blowing policy is intended to cover concerns that fall outside the scope of the existing procedures. That concern may be about something that:

- is unlawful; or
- is against the Company's policies; or
- falls below established standards or practice; or
- Amounts to improper conduct.

## 3. Safeguards

### 3.1 Harassment or Victimization

The Company recognizes that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice. The Company will not tolerate harassment or victimization and will take action to protect you when you raise a concern in good faith.

**3.2** This does not mean that if you are already the subject of disciplinary or redundancy procedures, that those procedures will be halted as a result of your whistle blowing.

**3.3 Confidentiality**

The Company will do its best to protect your identity when you raise a concern and do not want your name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence.

**Anonymous Allegations**

This policy encourages you to put your name to your allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Company.

**3.4** In exercising the discretion, the factors to be taken into account would include:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources

**3.5 Untrue Allegations**

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make allegations that are malicious or simply to cause anger, irritation or distress, disciplinary action may be taken against you.

**4. How to raise concern**

**4.1** As a first step, you should normally raise the concerns with your immediate supervisor or Head of Department. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. For example, if you believe that management is involved, you should approach the CEO or Chairman, the Company's Monitoring Officer-do you have such an individual or the Chief Financial Officer.

**4.2** Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are particularly concerned about the situation. If you do not feel able to put your concern in writing, you can call or meet the appropriate officer. For ease of contact a employee forum is made available at Company website for employees direct email to the Monitoring Officer and Senior Management.- do you have this on your website?????????

**4.3** The earlier you express the concern, the easier it is to take action.

**4.4** Although you are not expected to prove the truth of an allegation, you will need to demonstrate to the person contacted that there are sufficient grounds for your concern.

**4.5** Advice and guidance on how matters of concern may be pursued can be obtained from:

- Khalid Bashir -Chairman
- Zahid Bashir - Chief Executive
- Rao Ali Zeeshan– Chief Financial Officer
- Mirza Khadim Baig – ED- Marketing
- Niina Khan( EVP-HR Head) - Monitoring Officer

Alternatively, you may wish to talk directly with someone from the Audit Committee that interacts with the Company's external auditors. The Head of Internal Audit, Mr. Oan Ali is the contact person for the Audit Committee.

If you wish to go directly to the SECP the contact person is a Director (Supervision) Syed Nayyar Hussain Tel: +92-21-32461053  
Email: [nayyar.hussain@secp.gov.pk](mailto:nayyar.hussain@secp.gov.pk).

Information or advice on procedural matters is also available from Human Resources.

## **5. How the Company will respond**

**5.1** The action taken by the Company will depend on the nature of the concern. The matters raised may:

- To be investigated internally
- Be referred to the Police/Federal Authorities
- Be referred to the external Auditor
- Form the subject of an independent inquiry

**5.2** In order to protect individuals and the Company, initial enquires will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures will normally be referred for consideration under those procedures.

**5.3** Some concerns may be resolved by agreed action without the need for investigation.

**5.4** Within fifteen working days of a concern being received, the Company will write to you:

- acknowledging that the concern has been received;
- indicating how it proposes to deal with the matter;
- giving an estimate of how long it will take to provide a final response;
- telling you whether any initial enquiries have been made; and
- telling you whether further investigations will take place, and if not, why not.

**5.5** The amount of contact between the officers considering the issues and you, will depend on the nature of the matters raised the potential difficulties

involved and the clarity of the information provided. If necessary, further information will be sought from you.

- 5.6 When any meeting is arranged, you have the right, if you so wish, to be accompanied by a professional association representative or a friend who is not involved in the area of work to which the concern relates.
- 5.7 The Company will take steps to minimize any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, the Company will advise you about the procedure.
- 5.8 The Company accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will receive information about the outcomes of any investigations.

## 6. How the matter can be taken further

6.1 This policy is intended to provide you with an avenue to raise concerns. The Company hopes you will be satisfied. If you are not, you are always entitled to take the matter up with the Board of the Company. In addition, if you feel it is right to take the matter outside the Company, the following are possible contact points:

- the external Auditor (see para. 4.5)
- SECP
- relevant professional bodies or regulatory organizations
- your solicitor
- the Police/Federal Authorities

If you do take the matter outside the Company, you need to ensure that you do not disclose confidential information or that disclosure would be privileged. Check with the contact point about that.

## 7. The responsible officer

The Monitoring Officer has overall responsibility for the maintenance and operation of this policy. That officer maintains a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Company.

### Penalties

(1) The Competent Authority may impose any of the penalties stated in disciplinary actions, after taking into account the gravity of the allegations, the previous record of the Accused and/or any other extenuating or aggravating circumstances that may exist:

(2) The minor and major penalties shall include:

(i) **Minor penalties:**

(a) Censure or warning;

(b) Withholding, for a specific period, promotion or increment, which period shall not be more than 3 years;

(c) Recovery from Salary of the Accused, of the whole or any part of any pecuniary loss caused to Company or illegal gain made by the Accused.

(ii) **Major penalties:**

(a) Removal / dismissal from service.

(3) If a person is removed or dismissed from service he shall not be re-employed by the Company for all times to come.

(4) The dismissal from service shall entail forfeiture of terminal benefits except the Employee contribution to the provident fund and profit, if any made on such contribution.

(5) Any Penalty imposed under this Section will not absolve such Employee from liability to any punishment to which he may be liable for an offence under any law committed by him while in service.