



TRUSTED NOT TO COMPROMISE

# Whistle Blowing Policy

October 24, 2018



Title: **WHISTLE BLOWING POLICY**

Number HR/002

Effective Date: October 24, 2018

Version: 2

## 1. Objective

The whistle blowing policy is intended to be used only for serious and sensitive issues including but not limited to; fraud, corruption, unethical or illegal conduct or concerns effecting the reputation of the Company.

The objective of this Policy is to encourage and enable Employees to raise concerns regarding suspected unethical and/or illegal conduct or practices so that the Company can address and correct inappropriate conduct and actions. This policy does not apply to personal grievances which an Employee may have against Management or his/her colleagues.

## 2. Scope

This policy covers whistleblowing, including but not limited to the following:

- fraud or corruption
- unlawful conduct
- potential maladministration, misconduct or malpractice
- abuse of authority
- unauthorized use of Company funds
- failure to comply with a statutory or legal obligation
- breaches of financial regulations or policies
- health and safety issues including risks to the public as well as risks to the employees
- any attempt to prevent disclosure of any of the issues listed.

### **3. Procedure**

The possible violation may be reported internally in one of the following ways:

**a)** An employee can either send an e-mail to the Chief Executive or a sealed envelope marked “confidential” containing the complaint/information along with evidence.

**OR**

**b)** An employee can likewise send a sealed envelope marked as above but addressed to the Chairperson Board Audit Committee instead.

Once the complaint has been received and a prima facie case is made out for investigating the matter, the Chief Executive or the Board Audit Committee as the case may be, shall appoint a person or a committee as deemed fit to investigate the complaint and submit a written report. In case the Chief Executive or the Board Audit Committee find the complaint to be frivolous or lacking in veracity, they may close the matter.

### **3) Responsibility of Whistle Blower**

It is the responsibility of the whistleblower (Employee) to ensure such reports and claims are factual rather than speculative and that the complaint contains as much specific information as possible to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedures. No anonymous report will be accepted.

### **4) Responsibility of Management**

Management shall ensure that an Employee who makes disclosure in terms of this policy will not be penalized or suffer any adverse treatment for doing so and he/she will be treated in confidence. However, an Employee who does not act in good faith or makes an allegation for the purposes of personal gain and/or acts with malice will be subject to disciplinary action as per Company Policy which may include, but not be limited to, dismissal from service.

At the end of an investigation, the investigator(s) shall provide a written report that includes an investigation summary and findings to the Chief Executive or the Board Audit Committee as the case may be.

## 5) Reward for Whistle Blower

Upon conclusion of the case, Management may decide as to whether the information provided is worthy of reward, in case the information is such the whistle blower may be awarded appropriately as determined by the competent authority. The aim of this reward is to encourage people to “speak up” and as such does not require the award to be big.

**Prepared by:**  
**Zarrar Khan**  
GM – HR and Admin

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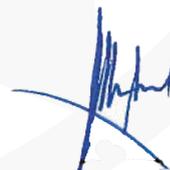
**Reviewed by:**  
**Kamal A. Chinoy**  
Chief Executive

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**Recommended by:**  
**Sadia Khan**  
Chairperson-BAC

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**Approved in the 449th Board Meeting held on October 24, 2018:**  
**Mustapha A. Chinoy**  
Chairman - BoD

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