



# Whistleblowing Program

**PAKISTAN MORTGAGE REFINANCE COMPANY LIMITED**

| Version | Ownership              | Approval Date  |
|---------|------------------------|----------------|
| 1.0     | Head of Human Resource | March 06, 2020 |



## Contents

|   |   |
|---|---|
| Principle and Purpose: .....                | 3 |
| Objective: .....                            | 3 |
| Applicability.....                          | 3 |
| Review & update of Policy and Program ..... | 3 |
| Responsibility of Whistleblower: .....      | 4 |
| Procedures for lodging complaints: .....    | 4 |
| Complaints handling procedure:.....         | 5 |
| Reward: .....                               | 5 |
| Reporting Requirements:.....                | 5 |
| Responsibility of BAC: .....                | 5 |



## Principle and Purpose:

PMRC endeavors to achieve a culture of openness and accountability along with maintaining high ethical standards in all its practices. In line with that commitment, the Whistle Blowing Policy would serve the purpose to foster an environment where staff as well as outside parties are encouraged to report any undesirable / suspicious activities without any fear of retribution/victimization and subsequent discrimination and/or being disadvantaged in any manner.

The Policy define “whistle-blowing” as “the reporting of alleged unethical conduct of employees, management, directors and other stakeholders of an institution by an employee or other person to appropriate authorities.” A whistle-blower is “any person(s) including the employee, management, directors, investors, service providers, creditors and other stakeholders of an institution who reports any form of unethical behavior or dishonesty to the appropriate authority”.

## Objective:

The objectives of this Program are to:

- develop a culture of, transparency, accountability and integrity;
- create awareness amongst employees and stakeholders regarding the Whistle Blowing Function;
- encourage confidence in all employees and other stakeholders to question and raise complaints in their interest and in the of PMRC;
- provide avenues for confidentiality of complaints raised and allow feedback on corrective measures employed;
- ensure existence of a mechanism that allows a whistleblower to monitor and where required, act against unsatisfactory proceedings;
- reassure a whistleblower of protection from possible reprisals or victimization, however; this Policy doesn't extend to a complainant who makes a complaint knowingly the same to be untrue
- eliminate unlawful / dishonest activities that may damage PMRC's reputation and business interests.

It shall be ensured by Management that employees remain aware of the existence of the Whistle blowing Policy.

## Applicability

The Policy shall be applicable to all of the employees and Board of PMRC.

## Review & update of Policy and Program

This Policy and Program shall be reviewed after every three years or as and when required and necessary updates shall be made with the approval of the Board.



## Responsibility of Whistleblower:

If any of the accusations falling under the scope of Whistleblowing Policy have occurred due to involvement of PMRC officials / staff members, the employees who have knowledge are required to report the matter as per procedures defined in this Program. The whistleblower must remain unbiased and objective while reporting matters under this Policy.

In making a complaint / allegation, the whistleblower should exercise due care to ensure accuracy of the information i.e. event, time period, staff name and financial, non-financial etc. matters. The complaint should be based on material facts rather than speculation or personal opinions, and contain specific information including valid reasoning and evidence as to why the noted event requires reporting. If any allegation is found to be malafide, malicious or false, in such case, PMRC management will take appropriate action against the whistleblower. The Company treats false and malicious allegations very seriously.

## Procedures for lodging complaints:

Following are the parties to Whistle Blowing process:

- All employees of PMRC as complainant / whistleblower.
- Any aggrieved party (other than PMRC's employees), including directors, vendors, contractors, service providers, clients or the general public as complainants / whistleblowers.
- Grievance Handling Committee.

All complaints / accusations are to be made in writing to the following with a clear statement of the issues being raised.

|                |  |
|----------------|--|
| <b>Name</b>    | Head of Compliance   |
| <b>Address</b> | Pakistan Mortgage Refinance Company (PMRC)<br>6 <sup>th</sup> floor, Bahria Complex I, MT Khan Road, Karachi 74000 |
| <b>Email</b>   | <a href="mailto:whistleblower@pmrc.com.pk">whistleblower@pmrc.com.pk</a>   |

All such mails should be marked "confidential" on the outer envelope and "whistle blowing" on the inside envelope for maximum confidentiality. All complaints being raised should have the following details:

- Complete background of event (location, date etc.)
- Nature of complaint
- Reasons for the complaint
- Names/designation of individuals against whom the complaint is being reported



- Any other information/supporting evidence if available; In case a complaint is raised by or against the Head of Compliance the same shall be reported directly to the Chief Executive Officer of PMRC at [ceo@pmrc.com.pk](mailto:ceo@pmrc.com.pk).

Any aggrieved party may file a complaint in accordance with prescribed procedures with the Head of Compliance as soon as the reportable matter comes to her/his attention.

## Complaints handling procedure:

Upon receiving Complaints/whistle blow, the Head of Compliance jointly with Head of HR will review the same and shall be handled in the following manner:

1. If the Complaints/Whistle blow will be related to improper conduct, violation of Employee Code of Conduct, Personnel Harassment, etc. then it will be dealt according to HR Policies of the Company.
2. If the Complaints / Whistle blow will be related to irregularities in Business, financial malpractices, frauds & forgeries then it will be treated according to Fraud and Forgery Policy of the Company. All other than above Complaints / Whistle blow will be dealt according to Grievances Redress Policy and Mechanism.

Accordingly, investigations shall be carried out by Internal Audit Function. The final report will be discussed / reported in Board Audit Committee.

## Reward:

In order to encourage the complete implementation this Program, Management may reward whistleblowers as a token of appreciation for saving the company from malicious, fraudulent, immoral activities or financial losses. However, no rewards shall be given in case of an anonymous complainant.

The reward shall be decided by the CEO & Head of HR. In case of reports against the CEO/Head of HR, the reward, if any may be finalized by the BAC/Board. Complete confidentiality shall be ensured so as to ensure that the reason of reward is kept confidential.

## Reporting Requirements:

All concerns and issues raised under this Policy will be treated in a confidential manner except to the extent necessary to conduct a complete and fair investigation. The identity of the Complainant shall be kept confidential at all cost.

Strict confidentiality shall be observed in the submission of investigation reports. Upon completion of investigation, an unbiased investigation report will be submitted to the Board Audit Committee through Head of Internal Audit for its review. Depending on severity of the issue, disciplinary action against employees of PMRC may be taken by the competent Authority in accordance with the company's HR Policies.

## Responsibility of BAC:

BAC is responsible for review of effectiveness of whistle blowing procedures. The BAC shall ensure that such concerns are treated confidentially and that the reporting employee(s) are protected and not penalized in any manner whatsoever.