

IN MEMORY OF SHAHEED MOHTARMA BENAZIR BHUTTO



WHISTLE BLOWING POLICY

Introduction

Sindh Insurance Limited is a quality conscious Company, therefore employs all available methods and processes to identify fault lines and take timely actions to address these in the larger interest of the Company. The Company is committed to the highest possible standards of honesty, excellence, consistency, compassion, fairness, integrity and accountability. The Company Whistleblowing Policy intends to encourage and enable all concerned to raise serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside.

The Policy applies to all employees, management and the Board members, and will extend to every individual associated with the Company including employees, contractors, suppliers, business partners and the shareholders etc. They are encouraged and have been enabled to participate without fear of reprisal or repercussions, in confidentiality, under defined reporting channels, with initial reporting to immediate supervisor and where this is impracticable, to report directly to the independent Whistleblowing Unit as per policy. Under the Policy, anonymous reporting concerns shall not be taken into consideration.

The objectives, scope and procedures of the Company’s ‘Whistleblowing Policy’ are as follows:-

Objectives

- To encourage confidence in all employees and other associated individuals to question and raise concerns in the interest of Company.
- To provide avenues for confidentiality of concerns raised and allow feedback on corrective measures employed.
- To ensure existence of a mechanism that allows a whistleblower to monitor and where required, act against the unsatisfactory proceedings.
- To reassure a whistleblower for protection from possible reprisals or victimization.

Scope

The Policy covers following concerns:-

- Conduct by anyone, which is an offence/breach of law.
- Failure to comply with legal/contractual obligations.
- Violation / noncompliance of Company’s policies / procedures.
- Violation of Public Sector Companies (Corporate Governance) Rules, 2013.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the Company's assets and corporate image.
- Possible fraud /corruption / incorrect financial and regulatory reporting with malafide intensions.
- Illegal use of sensitive company data.

Actions which are unprofessional, inappropriate or in conflict with a general understanding of what is right or wrong / unethical.

Safeguards against Victimization

The Company recognizes that the decision to report a concern can be difficult. However, if the report is true and well-intended, the whistleblower has nothing to fear because the report shall be in the line of duty towards the Company and/or for those to whom the Company provides its services.

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No harassment or pressures towards the whistleblower shall be tolerated and the Company shall protect all such individuals by providing an indemnity in its HR Policy.

Confidentiality

All concerns raised will be treated in confidence and wherever required, every effort will be made to maintain confidentiality of the whistleblower’s identity. At an appropriate time, one may however, need to come forward as a witness.

The policy encourages all to believe that disclosure of concerns is in the Company’s interest. It however cautions all concerned not to act maliciously or make false allegations. Similarly one must not seek any personal gain through this Policy.

Whistleblowing Unit

The Whistle Blowing Unit will comprise of the following officials of the Company:-

- Chief Internal Auditor.
- Company Secretary who shall also be the secretary of the unit.
- Head of respective division / department as co-opted member if not directly involved in the reported concern.

Procedure

The following procedure(s) need to be followed:

Raising Concern

- The employees witnessing any irregularity shall normally raise concerns with the immediate supervisor/manager. Depending upon the seriousness/sensitivity of the issues involved, a senior level officer of management within respective division/department may be approached. If the issue is not addressed at divisional / departmental level or warrants reporting to the higher level, Whistleblowing Unit may be approached. All others may also follow the same procedure to report the concerns.
- For whistleblowing related to Chief Executive Officer will be reported to the Chairman of the Board of Directors.
- All concerns shall be reported in writing to ensure a clear understanding of the issues being raised. It must contain the background, the nature of concern; relevant dates and timings where possible, the reasons for the concern and the names of individuals against whom the concern is being reported.
- Whistleblowers may report their concerns through the following methods:-

Confidential Call - To make a confidential call; the Unit members are available on phone through Company's PABX and/or the following e-mail address:-

- **E-mail** – whistleblowing@sindhinsuranceltd.com, which shall only be accessible to the Whistleblowing Unit

Regular Mail – Captioned ‘Whistleblowing Sindh Insurance Limited, 1st floor Imperial Court Building Dr. Ziauddin Ahmed Road, Karachi.

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In case a concern is against any member of the Whistleblowing Unit itself, the same may be reported directly to the Chief Executive Officer (CEO).

Handling Concern

- Each concern received by the Whistle Blowing Unit is to be logged and assigned a code that will be used in the subsequent investigation and reporting of the concern.
- Initial inquiries / assessments will be made by Chief Internal Audit in consultation with other members to determine whether an investigation is appropriate, and the form that it should take. Some trivial concerns may be resolved by agreed action without the need for investigation.
- An investigation will only be conducted if available information is sufficiently specific and if it contains adequate corroborating evidence to warrant an investigation.
- The Whistleblowing Unit in consultation with respective head of division / department shall nominate a person either from within the department and/or from any other department to investigate the concern.
- Person who is investigating any concern under this policy shall be empowered to seek information from the relevant persons and the concerned departments of the Company shall also cooperate with him.
- The investigation will be preferably completed within fifteen (15) days from the lodging of concern unless extended by the CEO.
- The Whistleblowing unit shall acknowledge receipt to the whistleblower within 07 days of receipt of the concern, with the indication that the matter will be dealt with as per Company policy.
- At the end of the investigation, a written report that provides the findings, basis of findings and a conclusion is to be submitted to the CEO by the Whistleblowing Unit.
- Matters related to CEO to the will be dealt as per advise of Chairman of Board of Directors.
- Whistleblowing Unit should mutually decide about disposal of the concern and disseminate messages across the Company for avoidance of such incidents in the future.
- Whistleblowing Unit will recommend to CEO for further investigation if required. In case of split decision, the case will be referred to CEO.
- Chief Internal Auditor will produce a quarterly report documenting all concerns and the actions taken to resolve them for the review of CEO.
- Record of all whistle blowing concerns, investigations, and reports is to be retained for at least 5 years.

False Allegations

Deliberately making a false concern is also an offence under this Policy and may lead to a disciplinary action against complainant.

Disclosure to external bodies

Whistleblowing Unit is not allowed to disclose internal concerns to any of the external bodies unless the disclosure is required by law.

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