



HUMAN RESOURCE POLICIES AND PROCEDURES

PFSL PAKISTAN

Whistle Blowing Policy

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All employees must promptly notify the organisation of inappropriate conduct so that it can be properly addressed. Employees who are aware of or suspect fraud, misappropriation of funds, theft, other misuse of organisation's resources or assets, accounting irregularities, or other violation of these principles or organisation's policy, should report their concerns immediately to their supervisor and HR Department either directly or through email. Serious violations may also be reported to the CEO. The whistle-blower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action which may lead up to termination.

Whistle-blower protections are provided in two important areas - confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistle-blower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defence. The company will not retaliate against a whistle-blower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistle-blower who believes is being retaliated against must contact HR Department immediately. The right of a whistle-blower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

All reports of illegal and dishonest activities will be promptly submitted to an Investigation Committee constituted for this purpose and will, if so required, be brought in to attention of the HR Committee of the PFSL Board.