

WHISTLE BLOWING PROGRAM - FAQs

What is whistle blowing?

Whistleblowing is the reporting of suspected unethical business practice, conduct of employees, management, board of directors and any other stakeholder to the authorities (Chief internal auditor, Whistle blow unit or other appropriate counters).

What is Complaint?

A complaint is lodged to raise a grievance of a staff related matters or other acts which does not comes under the definition of whistleblowing.

What is the difference between “Complaint” and “Whistle Blowing”?

Whistle blowing can be broadly defined as simply ‘raising a concern’. Such concern may be raised by any stakeholder (Employee, Customer, Vendor, Etc.) in the larger interest of the organization whereas a complaint is lodged to raise a grievance of a staff related matters or other acts which does not comes under the definition of whistleblowing.

What is Whistle blow program?

The Program is intended to encourage staff and other relevant stakeholders (including outsiders) to report perceived or suspected misconduct of employees, management, directors and other stakeholders to appropriate authorities(Chief internal auditor, Whistle blow unit or other appropriate counters) in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising concern(s).

What are the objective of whistle blowing program?

Main objective includes:

- To ensure all stakeholders feel supported in speaking up in confidence and reporting matters they suspect may involve improper, unethical or inappropriate conduct within the Bank;
- To encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of the organization;
- To provide clear procedures for reporting and handling such concern(s);
- To proactively prevent and deter misconduct which could impact the financial performance and damage the Bank & groups’ reputation;
- To provide assurance that all reporting will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
- To help promote and develop a culture of transparency, accountability and integrity.

Who is whistle blower?

Whistle-blower is a person or institution, who blows the whistle and sends communication in Good Faith to the appropriate pre-identified authority (Chief internal auditor, Whistle blow unit or other appropriate counters), following the process as prescribed, including current, temporary or former employees, shareholders, directors, vendors, contractors, service providers, customers, or the general public.

What to report?

Included but not limited to:

- All forms of financial malpractices or impropriety such as fraud, corruption, bribery, theft, embezzlement and concealment;
- Failure to comply with legal obligations, statutes, and regulatory directives;
- Actions detrimental to Health and Safety or the work environment;
- Any form of criminal activity;
- Improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, transparency, honesty, accountability and fairness;
- Other forms of corporate governance breaches;
- Connected transactions not disclosed or reported in line with regulations;
- Insider abuse;
- Non-disclosure of interests;
- Sexual or physical abuse of staff, customers, prospective staff, service providers and other relevant stakeholders;
- Attempt to conceal any of the above listed acts;
- Suspect questionable, unethical or unlawful accounting, practices and procedures;
- Intentional breach or failure to implement policies as approved by board, procedures and processes as approved & implemented by the management ; and
- Misleading or any act of coercion.

Can I Blow the Whistle for HR Related Matters?

Such incidents will be processed according to the Grievances handling Procedures stipulated in the Human Resources Policies / Procedures Manual.

How to blow the whistle?

A whistle may be made in writing at mailing address or email address of the Chief internal Auditor & Whistle blow Unit or through ABPL official website.

An employee / stakeholder who reasonably deems that inappropriate conduct is occurring; They can raise such issues directly to Unit Head - WBU / Chief Internal Auditor via below channels.

1. Whistle blowing email ID:

Can send email at whistleblow@albaraka.com.pk

2. Official website:

Lodge their concerns via Blow The Whistle link available at AL Baraka website <https://www.albaraka.com.pk/>.

3. Write Directly to Chief Internal Auditor or Unit Head-WBU:

Whistleblower can write directly to Unit Head - WBU / Chief Internal Auditor at below given addresses:

Chief Internal Auditor Internal Audit Function Al Baraka Bank (Pakistan) Limited 4 th Floor, Plot No. 162, Bangalore Town, Main Shahra-e-Faisal, Karachi, Pakistan	Unit Head - Whistle Blow Internal Audit Function Al Baraka Bank (Pakistan) Limited C-17, Block-10, Scheme-16, F.B Area, Karachi, Pakistan
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Will the Bank maintain Confidentiality?

All matters will be treated in strict confidentiality and the identification of the Whistleblower will not be disclosed except for inevitable situations, where disclosure of the identity of the Whistle-blower is essential (for instance, his/her statement/evidence is needed in court or by legal authorities) or it has to be disclosed to those persons who have a need to know, in order to properly conduct an investigation of the concerns raised.

Can Anonymous Reporting be made?

The Al Baraka (Pakistan) Limited, respects the wish of the Whistle-blower to remain anonymous i.e. not revealing his or her true identity. However, it must be appreciated that it is more efficient to follow up and to verify concerns if the whistleblower does provide his or her name. Reports raised anonymously will be considered at the discretion of the investigating parties designated by the Audit Committee. Factors taken into considerations when exercising this discretion include, but are not limited to, the following:

- The alleged wrongdoer;
- The seriousness of the allegation;
- The credibility of the allegation;
- The likelihood of confirming the allegation from attributable sources; and
- The urgency of an investigation and resolution.

The Bank is not accountable for maintaining anonymity where the Whistle-blower has told others of the misconduct or concern in an open/non-confidential manner.

What will happen if False Allegations are made?

The sensitive nature of the corporate and professional reputation demands that bank view very seriously any report that proves to be unsubstantiated have been submitted knowing it to be false, based on personal grudges or with malicious intent. The Bank regard the making of such reports as a serious disciplinary offence that entails a disciplinary action in accordance with the applicable laws, internal rules, policies and procedures. Furthermore, the Banks bear no legal or professional responsibilities towards false allegations.

If a Whistle-blower makes an allegation in Good Faith, but it is not confirmed subsequently by the investigation, no action will be taken against him/her.

Whistle-blowers are encouraged to the highest Islamic ethical standards and to take every care to ensure the accuracy of the information before making an allegation.

To ensure healthy working environment, reporting of biased and / or unfounded allegations to victimize any person and/or the bank will be treated as an offence and the bank reserves its right to take any suitable action against such whistle blowers.

Protection & Reward for Complainants

Al Baraka Bank Pakistan(ABPL) stands committed to protecting Whistle-blowers who make a disclosure or raises a concern under this Program from retaliation, if the person:

1. Discloses the information in Good Faith;
2. Believes it to be substantially true;
3. Does not act maliciously or make false allegations, and
4. Does not seek any personal or financial gain.

Retaliation or victimization of whistle blowers is improper behavior and will not be tolerated. The Bank, as deem fit, may reward the whistle blower upon highlighting of any wrongdoing. The reward may be given in any form of incentive after approval of the appropriate / relevant authority.