

# ALSHAHEER FOODS

## Whistleblowing Policy

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1 <sup>st</sup> Amendment Date:	-
2 <sup>nd</sup> Amendment Date:	-

## Policy Statement

*“All employees are expected to maintain high standards of honesty and integrity, and are encouraged to report any wrongdoings observed”*

## 1 - Introduction

### 1.1 – Objective

- Encourage all employees and stakeholders to identify and report any wrongdoings within the Company.
- Provide avenues for confidentiality of concerns raised and allow recommendations on corrective measures.
- Provide protection to a whistleblower from possible reprisals or victimization.

### 1.2 – Scope

The Policy covers following concerns:

- Conduct by anyone, which is an offence / breach of law.
- Failure to comply with legal obligations.
- Violation / noncompliance of Company’s policies and procedures.
- Health and safety risks, including risks to the public as well as employees.
- Damage to the environment.
- Damage to Company assets and corporate image.
- Possible fraud / corruption and incorrect reporting with mala fide intentions.
- Unauthorized use of sensitive company data.
- Actions which are unprofessional, inappropriate or unethical.
- Miscarriage of Justice.

### 1.3 – Responsibility & Custodianship

The Head of Internal Audit will have the overall responsibility for implementation of this policy. This policy shall be maintained / updated by the Internal Audit dept. and remain in permanent custody of the Head of Internal Audit.

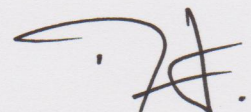
## 2 - Definitions

**Company:** Al Shaheer Corporation Ltd. (ASC Foods).

**Allegation:** Accusation before proving with evidence.

**Complaint:** The information about any alleged fraud, improper conduct or wrongdoing.

**External Bodies:** Any external person, group of persons and any state regulatory body.



**Improper conduct or Wrongdoing:** Any fraudulent activity, theft, corruption, substantial mismanagement of Company's resources, misuse of Company's assets, a civil wrong or criminal act, other violations of Company's Code of Conduct / core values.

**Victimization:** Unwarranted singling out of an employee or group of employees for subjection to crime, exploitation, offense and unfair treatment etc.

**Whistleblowing:** Voluntary disclosure by an employee of a wrongdoing in the Company, to the whistleblowing committee.

**Whistleblower:** Any employee who makes or attempts to make a disclosure of improper conduct, wrongdoing or fraud to the whistleblowing committee.

**Whistleblowing Committee (WBC):** The organizational body responsible for handling all concerns raised under the Whistleblowing policy.

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### 3 – Confidentiality and protection of whistleblower

ASC Foods encourages its staff to blow the whistle if they become aware of a malpractice that has occurred or is occurring. However, it is expected that the whistleblower will raise concerns in good faith, without any malice and in line of duty towards the company. Further, there must be sufficient reason to believe that there is serious misconduct. Malicious allegations by employees may result in disciplinary action against the complainant.

The identity of whistleblower will not be disclosed and information passed on through whistleblowing will be kept confidential to protect the reporting person as well as the accused for any consequent discrimination or unfair treatment. The whistleblower will be protected against unfair treatment from his / her colleagues and management and any harassment or pressure towards the whistleblower will not be tolerated by the company. Anonymous complaints however, may not be entertained.

WBC will not disclose internal concerns to any external body unless the concern raised involves legal provisions or the disclosure is required by law.

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### 4 – Whistleblowing Committee

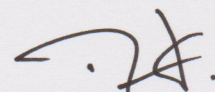
The whistleblowing committee (WBC) will assess the reasonableness / adequacy of such reporting and will recommend investigation, if needed. CEO will have the authority to decide final course of action after the investigation.

If the complaint is against any member of the WBC, the whistleblower may report the matter to the CEO. The accused member of the WBC will not be part of the committee for the concerned complaint. The WBC shall comprise of at least any three of the following:

- Deputy CEO.
- Head of Human Resource.
- Company Secretary.
- Head of Internal Audit.

Deputy CEO will be the Chairman of the WBC. All members of the WBC will have access to the dedicated whistleblowing email address – refer Section 5 (emails coming to the whistleblowing email shall go automatically to all members of the committee).

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The WBC shall:

- Conduct an enquiry in a fair and unbiased manner.
  - Ensure complete fact finding.
  - Minute committee deliberations.
  - Document final report.
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## 5 – Procedure: How to blow the whistle

The complaint can be reported via following methods:

- Through email at **whistleblowing@ascfoods.com** preferably with whistleblower's identity
- A phone call to the Head of Internal Audit on **021-38781197**
- Letter by post to Head of Internal Audit at the Karachi Head Office address

WBC will then review and investigate the matter of concern.

Each concern received by the WBC will be logged and acknowledged to the whistleblower.

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## 6 – Action

If the results of an investigation confirm that an offence has been committed, depending on the severity of the violation, the following sequence of actions by the WBC is suggested:

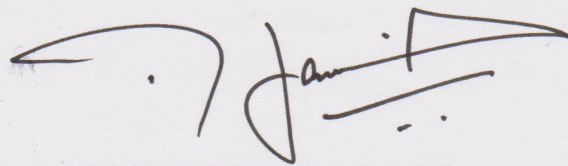
1. First warning: Disciplinary warning, in writing.
2. Second warning, in writing.
3. Suspension without pay.
4. Termination.

If the magnitude of the complaint is material and the same has also been established by the WBC, then immediate termination can also be made.

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## 7 – Implementation

- The whistleblowing policy is to be placed at highly visible locations throughout the organization both in English and Urdu languages.
- Selected training sessions should include this policy as a refresher for employees and provide any clarifications needed.



Deputy CEO