



**PACKAGES LIMITED**

**WHISTLE BLOWING POLICY &  
PROCEDURE**

Particulars	Description
Ownership	Internal Audit Department
Review Frequency	After 3 years unless necessitated earlier
To be Recommended by	Audit Committee of the Board
To be Approved By	Board of Directors
Date of Last Approval/ Revision	October 28, 2021
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## 1. Purpose and Scope

1. The purpose of this policy is to provide guidelines to establish an objective and impartial process for prevention, detection and remedial measures of unethical behavior, corruption and fraudulent activities that may cause damage to the company's assets or reputation. This would ensure a safe, ethical and productive working environment free from any prejudice, harassment, fraud or other malpractices.
2. We encourage our employees, contractors, suppliers, customers and other stakeholders to question, discuss and share information regarding any suspected irregularities or non-compliances.
3. The type of issues which can be reported under this policy include but are not limited to:
  - Breach of the Code of Conduct.
  - Corruption and bribery.
  - Harassment.
  - Misappropriation of financial data/reports.
  - Misuse of company's assets.
  - Fraud / Forgery / financial malpractices
  - Deliberate falsification of company records
  - Violation of applicable laws and regulations.
  - Actions raising safety, security, and environmental concerns.
  - Damage to company's reputation or business.
  - Disrespect of employees and
  - Discrimination of employees on the basis of race, color, gender, ethnicity, age, nationality, ancestry, religion, physical/ mental disability or marital status.

Complaints regarding harassment or employee grievances will be referred to HR for handling the matter as per "Anti-Harassment Policy" and "Grievance Policy".

## 2. Objective:

1. In order to ensure safeguarding of company's assets, reputation and business relationships, this policy encourages and enables all employees, contractors, suppliers, customers, and other stakeholders of Packages to raise their concerns rather than overlooking them.
2. Raising of concerns does not mean disloyalty to colleagues, subordinates or supervisor; rather it is a valuable contribution towards them and the company which would prevent inequality, harassment or harmful trend of dishonesty, unlawful or unethical conduct.



3. Whistle blowing process has been devised to:
  - Encourage the raising of concerns and feel confident in questioning and acting upon the Code of Conduct.
  - Provide channels to raise concerns in confidence and receive feedback on any action taken.
  - Ensure that response is provided against concerns; and
  - Assure complainants that their identity would be kept strictly confidential and protected from possible reprisals.
4. All complaints should be lodged, or concerns should be raised in good faith. However, if it is found that the complainant made a false accusation out of a personal grievance or malicious intent, then disciplinary action may be taken against the complainant.
5. This policy would be disseminated throughout the company for creating awareness and encouraging people to raise their concerns with confidence.

### **3. Complaint Reporting & Investigation Procedure**

1. Any employee, contractor or stakeholder who believes that he/ she has been a victim of discrimination, harassment, or becomes aware of any activity which is not in the best interests of the company or breaches the Code of Conduct or law should immediately report the issue. Confidentiality of all complaints would be ensured, and appropriate remedial action would be taken after thorough verification/ investigation of underlying facts and details.
2. Whistle Blowing is the responsibility of all employees, as raising a concern for known offence and violation is compulsory. Employees will be held accountable in case any wrongdoing has been in their knowledge and he / she willfully failed to report it.
3. Whistle blowing complaints can be raised through below mentioned communication means or by directly approaching the Head of Internal Audit. For communication of complaints, the following modes should be used which would be directly communicated to the Chairman Audit Committee:

By email: “whistle@packages.com.pk”

By mailing address: Head of Internal Audit Shahrah-e-Roomi. P.O. Amer Sidhu Lahore – 54760 Packages Limited Lahore, Pakistan

By telephone: +92-42-35811541-46 (Ext:392)

By mobile: 0301-8491395

4. Complainants have the right to raise complaints anonymously, however, they are encouraged to include contact information which would be useful during investigation. Anonymous complaints are discouraged and may not attract any action thereon unless there is sufficient evidence provided along with it to proceed further. Confidentiality and protection of complainant's identity would be ensured.



5. Upon initial evaluation and verification, if it is determined that the complaint constitutes an act of harassment, breach of the Code of Conduct or law or constitutes unethical business practices; a thorough investigation of the complaint would be carried out by the Internal Audit Department with high level of objectivity, impartiality, and fairness.
6. The Internal Audit Department may involve or consult relevant departments or subject experts for investigation of the complaint.
7. Head of Internal Audit shall seek consultation from the Chairman Audit Committee for investigation matters, where required.
8. After investigation, if it is established that the allegations in the complaint are valid, management may take appropriate action against the accused. No action will be taken against anyone accused of wrongdoing before an accusation has been duly investigated. However, the company may suspend those activities which could result in financial or reputational loss while the investigation is in process.

#### **4. Whistleblower Protection:**

1. No hardship, loss, or penalty may be imposed on an employee in response to:
  - Filing or responding to a bonafide complaint.
  - Appearing as a witness in the investigation of a complaint.
  - Serving as an investigator of a complaint.
2. Retaliation, intimidation, disciplinary action, harassment, suspension, dismissal etc. in response to lodging a complaint or invoking the complaint process is a violation of this policy. Any person who is found to have violated this aspect of the policy will be subject to sanctions up to and including termination of employment.

#### **5. Management Of Complaints**

1. The Internal Audit Department is responsible for handling all complaints under this policy. A summary of all complaints received as well as the status of the investigation and outcome would be provided to the Board Audit Committee on a quarterly basis by Head of Internal Audit.
2. The Audit Committee has exclusive power to close, direct further investigation or declare an ongoing investigation as dormant.