

Whistle Blowing Policy

Introduction

An important aspect of accountability and transparency is a mechanism which enables all individuals to voice concerns internally in a responsible and effective manner when they discover information which they believe shows serious risk for, or malpractice in, PPAF.

The term “Whistle Blowing” is used to describe the proactive approach taken within the Organization by its employees and the stakeholders to disclose a wrong doing or mal-practice to the appropriate forum within the Organization and serves as a key element in safeguarding PPAF’s integrity, and, encourages and enables employees to raise concerns rather than overlooking the matters of concern.

PPAF’s policy enables staff and other stakeholders to report irregularities, malpractice or wrongdoing, affecting PPAF, in a responsible and effective manner, without having to fear that their action may have adverse consequences.

Objective

The objective of the policy is to establish appropriate and timely handling of the receipt, retention, and treatment of alleged malpractices / misconduct. Further, this will provide a means for discreet and confidential channel for escalation of concerns without fear of reprisal.

Responsibility:

There will be a Whistle blowing Committee (WBC) comprising one GH (as nominated by the CEO), Chief Internal Audit and Head HR which will assess the reasonableness / adequacy of such reporting and will recommend investigation, if needed. The Chief Internal Audit shall be in-charge of the WB committee and will be responsible for execution and compliance of this policy. The committee may also call the accused after the initial investigation. The CEO will have the authority to decide the final course of action. If the complaint / allegation is against any member of the committee, the Whistle Blower may report the matter to the CEO. If the complaint / allegation is against the CEO, the WBC may report the matter to the BoD.

Confidentiality & Protection of Whistle Blower:

WBC is committed to this policy and encourages the staff to blow the whistle if there is a genuine concern that a malpractice has occurred or is occurring. It is however expected that the Whistle Blower will raise the concerns in good faith and without any malice and that the charges contained in his/her complaint are substantially true. Information passed on through whistle-blowing will be kept confidential to the extent possible to protect the reporting person as well as the accused from any consequent discrimination or unfair treatment. If such a complaint is made in good faith acting in the best interest of PPAF, the whistleblower will be protected against any unfair treatment from his/her colleagues, or management, as a consequence. Anonymous complaints however, shall not be entertained.

Harassment or victimization of Whistle Blower:

This policy provides a discreet and confidential channel for escalation of genuine concerns without fear of reprisal. Any form of harassment, victimization or retaliation undertaken by a staff member against any person for reporting an irregularity in good faith is prohibited and considered to be a breach of the loyalty and professional ethics requirements of the Code of Conduct. In such a case disciplinary measures shall be taken against that person. Where a case of false whistle blowing arises, the whistle blower may be subject to disciplinary action following an investigation into the case.

Procedure - How to blow the whistle / raise a concern:

If someone has a concern about a malpractice or any wrongdoing, he/she is encouraged to report it directly to the Chief Internal Auditor PPAF using any of the following methods:

- In writing under private and confidential cover to the Chief Internal Auditor at PPAF's address House # 90, Margalla Road, F-8/2, Islamabad, Pakistan.
- All written concerns can also be sent through email at whistleblow@ppaf.org.pk or through fax at +92-51-2282261 or through visiting our website www.pfaf.org.pk.
- By calling at 0092 51 8439450-79 to the Chief Internal Auditor.

Each concern received by the WBC to be logged and assigned a code that will be used in the investigation and reporting of the concern.

The WBC shall inform to the whistleblower within seven (7) days, from the date of receipt of the concern, acknowledging that the concern was received and informing that the matter will be dealt with as per Company policy.

Possible Instances of malpractices

Non-exhaustive lists of instances of malpractices that may trigger whistle blowing are cited below for reference which may be amended from time to time.

1. Breach of PPAF's Polices / Manuals or any action that is unlawful or may damage the reputation of PPAF.
2. Fraud or deception with the intention of gaining an undue advantage, avoiding an obligation or causing loss to another party.
3. Forgery or alteration of financial / non-financial documents or account belonging to PPAF.
4. Direct or indirect involvement in misappropriation of funds, supplies or other assets.
5. False reporting / representations of fact, whether by words or by conduct, to other stakeholders.
6. Taking or giving bribes or any illegal gratification.
7. Disclosure of confidential information.
8. Matters which give rise to harassment, discrimination or other unfair employment practices.
9. Any act in violation of Safety Health & Environmental standards applicable to the business.

Pakistan Poverty Alleviation Fund

Whistleblowing Form

For office use only	
Date	
Ref. No	
Received by	

1. WHISTLEBLOWER / REPORTER'S CONTACT INFORMATION	
NAME	
CONTACT NUMBER	
E-MAIL ADDRESS (optional)	
ADDRESS	

2. ACCUSED / SUSPECT'S INFORMATION	
NAME	
DESIGNATION	
ORGANIZATION (optional)	
CONTACT NUMBER (optional)	
E-MAIL ADDRESS (optional)	
ADDRESS (optional)	
ANY OTHER DETAILS ABOUT SUSPECT	

3. COMPLAINT TYPE
<p><input type="radio"/> Theft & embezzlement</p> <p><input type="radio"/> Corruption and bribery</p> <p><input type="radio"/> Procurement related fraud</p> <p><input type="radio"/> Misuse of PPAF resources / authority</p> <p><input type="radio"/> Failure to comply with requirement related to financial disclosure and/or local laws</p> <p><input type="radio"/> Misrepresentation of facts</p> <p><input type="radio"/> Breach of funding agreement with PPAF</p> <p><input type="radio"/> Any other</p>

4. BRIEF DETAILS OF THE COMPLAINT