

Human Resource
Department

WHISTLE BLOWER POLICY

August 2025

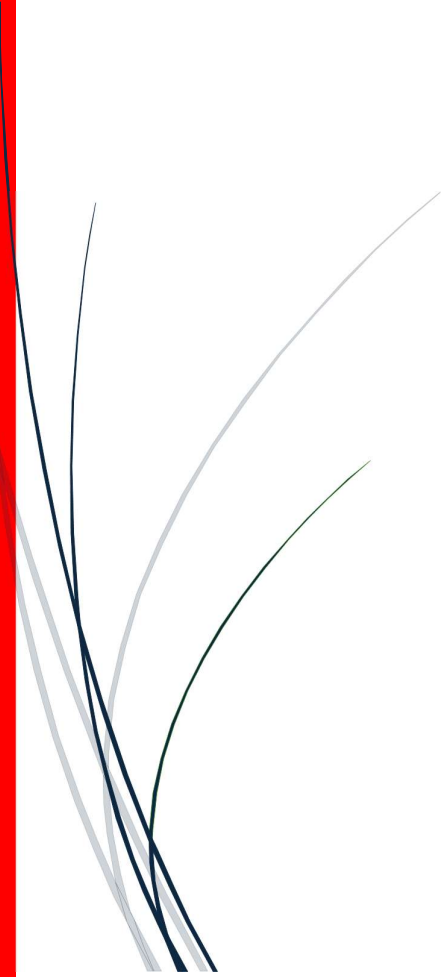


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Introduction

Pak Oman Investment Company Limited ("POICL") is committed to upholding the highest standards of ethics, integrity, and accountability. This Whistle blower Policy is designed to promote an environment where individuals feel safe and supported when reporting concerns about actual or suspected wrongdoing within the organization.

The policy is an integral part of POICL's internal control and risk management framework. It serves to facilitate the reporting of fraud, misconduct, harassment, and other irregularities that are not adequately addressed by existing procedures.

Basic principles

- All individuals must have access to a safe and confidential reporting mechanism.
- No retaliation will be tolerated against whistle blower acting in good faith.
- Whistle blower identities will remain confidential, except where disclosure is legally mandated or necessary for a fair hearing.
- Allegations will be verified and, where substantiated, appropriate remedial action will be taken.
- Individuals implicated in reports shall have the right to respond to allegations.

Scope & Applicability

This policy applies to:

- All employees, contractual staff, outsourced workers, interns, and trainees
- Members of the Board of Directors
- Suppliers, vendors, and service providers
- Partner institutions, donors, and government/corporate partners affiliated with POICL

Note: Personal grievances or administrative issues with individual interest shall be directed to relevant HR grievance channels

Definitions

- **Whistle blower:** An employee, contractor, or any individual associated with an organization who reports, in good faith, suspected misconduct, violations of law, regulation, company policies, or ethical standards to the appropriate internal or external authorities.
- **Whistle blowing:** The act of a whistle blowing revealing any information about unethical, illegal, corrupt, or fraudulent activities within an organization, usually to those who can take corrective measures.
- **Protected Disclosure:** A good-faith disclosure of information related to wrongdoing.
- **Wrongdoing:** Includes but is not limited to fraud, corruption, harassment, unethical behaviour, or violations of law or internal policies.
- **Retaliation:** Any adverse action taken against a whistle blower due to their report.

Responsibility of Whistle blower

- Whistle blower must act in good faith, provide accurate information, and avoid personal bias or malicious intent.
- Reports should include how the individual became aware of the issue, the names involved, the date and place of the incidents, and any supporting evidence.

Procedure for Lodging Whistle blowing Complaints

- Reports may be made verbally or in writing to the designated email: **whistleblower@pakoman.com**.
- The Whistle blower Form (Appendix I or II) should be used when possible.
- The whistle blower policy made available online on the company web side.
- All such above matters reported on the above email should be directed to Head of Internal Audit under supervision of Board Audit Committee.
- The Internal Audit shall independently conduct a preliminary assessment within 10 working days and escalate matters as necessary.
- A final investigation report will be submitted to the Board Audit Committee within 30 working days.

- If existing channels are inappropriate due to a conflict of interest, staff may report directly to the CEO.

Reporting of Matters

- Anonymous complaints are discouraged but not outright rejected. Management reserves the right to investigate based on available information.
- Unauthorized disclosure of internal matters to external parties is prohibited unless required by law.
- The Head of Internal Audit shall report whistle blower activity to the Board Audit Committee on a quarterly basis.

Handling Complaints

- Reports must be factual and specific.
- Complaints that do not meet policy criteria may be resolved through agreed-upon action without a formal investigation.
- All staff must cooperate with investigations and refrain from obstructing the reporting process.

Disciplinary Action

- If wrongdoing is proven, disciplinary action will be taken in accordance with POICL's rules.
- External offenders may be subject to legal proceedings.
- False or malicious reports may result in disciplinary measures against the whistle blower.

Protection For Whistle blower

- Whistle blower acting in good faith will be protected against retaliation.
- Identity confidentiality will be maintained unless disclosure is required by law or necessary for the purposes of due process.
- Retaliation is a serious breach and will attract strict disciplinary action.

Staff fearing retaliation may approach the Head of HR or Head of Internal Audit to request protective measures. Staff members, who make a report in bad faith, particularly if it is based knowingly on false or misleading information, shall not be protected and shall be subject to disciplinary measures.

Rights of Persons Implicated

- Individuals named in reports will be notified once it is appropriate to do so.
- They will be allowed to respond in writing or in person.
- All personal data will be handled in compliance with applicable data protection regulations

Administration of the Policy

- The Head of Human Resources, in coordination with the Head of Compliance and Head of Internal Audit, shall recommend changes to the policy for approval by the CEO.
- The policy shall be reviewed every **three years** or earlier if required by law or internal review.

Appendix-I

Whistle Blower Form – For Employees

(All Information will be Kept Confidential)

Basis Information:

- 1- Name _____
- 2- Mobile # _____
- 3- Landline# _____
- 4- Email _____

Nature of Issue:(please tick)

- | | | |
|------------------------------------|---------------------------------|------------------------------|
| 1- Forgery _____ | 4) Fake Expenses _____ | 8) Harassment _____ |
| 2- Misappropriation of funds _____ | 5) Misconduct _____ | 9) Other _____ |
| 3- Concealment _____ | 6) Bribery _____ | 10) Funds Embezzlement _____ |
| 4- Unethical Activity _____ | 7) Misuse of POICL Assets _____ | 11) Other _____ |

Location of Incident (e.g specific location and department) _____

How long has this incident been taking place or particular date _____
of incident?

How Many times the incident took place? _____

Nature of issue (Please tick)

Financial _____

Operational _____

Describe nature of your concern with sufficient information as an independent person may understand the issue:

Detail of evidence (if any) _____

Declaration: I hereby solemnly declare that the information provided above is true to the best of my knowledge and belief and I have no other motives in highlighting the issue in the best interest of POICL. I further declare that I have read and understood whistle blowing program and i will abide by program contents.

Date: _____

Signature of Whistle blower

Appendix-II

Whistle blower Form – For Vendors, Customer, Third Parties etc

(All Information will be Kept Confidential)

Basis Information:

1- Name _____

2- Mobile # _____

3- Landline# _____

4- Email _____

Nature of Issue:(please tick)

1- Forgery _____

4) Fake Expenses _____

8) Harassment _____

2- Misappropriation of funds _____

5) Misconduct _____

9) Other _____

3- Concealment _____

6) Bribery _____

10) Funds Embezzlement _____

4- Unethical Activity _____

7) Misuse of POICL Assets _____ 11) Other _____

Location of Incident (e.g specific location and department) _____

How long has this incident been taking place or particular date _____
of incident?

How Many times the incident took place? _____

Nature of issue (Please tick)

Financial _____

Operational _____

Describe nature of your concern with sufficient information as an independent person may understand the issue:

Detail of evidence (if any) _____

Declaration: I hereby solemnly declare that the information provided above is true to the best of my knowledge and belief and I have no other motives in highlighting the issue in the best interest of POICL.

Date: _____

Signature of Whistle blower