



**Making Pakistan Resilient**

# **NATIONAL DISASTER RISK MANAGEMENT FUND**

## **WHISTLEBLOWER POLICY**

(Approved in 10<sup>th</sup> Board Meeting held on 23<sup>rd</sup> October, 2018)



Chief Executive Officer





Company Secretary

# WHISTLEBLOWER POLICY

## 1. INTRODUCTION

- 1.1. National Disaster Risk Management Fund ("The Fund") strives for improvement in governance and service quality and encourages its employees, who have concerns about suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Fund, to come forward and express such concerns without fear of punishment or unfair treatment.
- 1.2. The employees and outside parties are encouraged to use the guidance provided in this Policy for reporting any wrong doing / improper conduct. This Policy is intended to assist all those individuals, who believe they have discovered malpractice or impropriety.
- 1.3. This Policy is not designed to question financial or business decisions taken by the Fund and/or its Board of Directors, nor should it be used to reconsider any matters which have already been suitably addressed.

## 2. PURPOSE

The purposes of this Policy are:

- 2.1. To provide avenues for employees to raise concerns and define a way to handle these concerns;
- 2.2. To enable Management to be informed at an early stage about acts of misconduct;
- 2.3. To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure; and
- 2.4. To help develop a culture of transparency, honesty, integrity, fairness and accountability that is in the greater interests of both the employees and the Fund.

## 3. SCOPE

- 3.1. This Policy provides a procedure to resolve work-related issues in fair manner. It governs the reporting and investigation of improper and illegal activities at the Fund including, but not restricted to:
  - a. Conduct that is an offence or a breach of law;
  - b. Failure to comply with a legal obligation;
  - c. Disclosures related to departure from justice;

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- d. Health and safety risks, including risks to the public as well as other employees;
  - e. Damage to the environment;
  - f. Unauthorized use of funds;
  - g. Possible incidence of fraud and corruption including bribery;
  - h. Using business relationship for personal gains;
  - i. Membership of banned outfits;
  - j. Actions which are unprofessional, inappropriate or in conflict with a general understanding of what is right and wrong; and
  - k. Other unethical and immoral conduct which contravenes the Fund's Code of Conduct.
- 3.2. This Policy applies to all Management and Non-Management Employees, Vendors, Contractors, FIPs and Consultants etc. This Policy also includes other personnel associated in any other manner with the Fund.
- 3.3. This policy is in addition to the Fund's other Policies and Procedures on complaints such as "Grievance Reporting and Redressal" etc.

#### 4. **DEFINITIONS**

In this Policy, certain terms have been used with specific meanings and interpretation. Glossary of such terms is attached as Annexure 'A' to this Policy.

#### 5. **POLICY STATEMENT**

- 5.1. The Fund is committed to the highest possible standards of integrity, ethical and moral behaviour and legal business conducted to foster and maintain an environment and a mechanism where employees can participate in the process fairly and fearlessly.
- 5.2. The Fund conducts business based on the principles of fairness, honesty, transparency, openness, decency, integrity and respect.

#### 6. **WHISTLEBLOWING PHILOSOPHY**

- 6.1 The Fund will not tolerate any harassment or victimization (including informal pressures) and will take appropriate action to protect the employees when they raise a concern in good faith;
- 6.2 If the employees believe that they have been subject to retaliation because they have taken any of the actions referenced above, or any coworker or other person is aware that any such retaliation may have been made against any employee, the coworker or the employee should report such conduct to the person designated to receive a report under this Policy; and

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6.3 The Fund will review promptly any complaint of retaliatory or other similar behavior. Complaints and investigations will be handled in a confidential manner, consistent with any corrective action that needs to be taken by the Fund.

## 7. **WHISTLEBLOWING COMMITTEE**

7.1 There shall be a 'Whistleblowing Committee', which shall be responsible for handling and managing all whistleblowing concerns and complaints. The committee will consist of following:

Chairman / Compliance Officer	:	Chief of Staff/General Manager SS
	:	Head Internal Audit
Member	:	To be appointed by the CEO on case-to-case basis.
Member	:	

7.2 The CEO may replace / reconstitute the Whistleblowing Committee or any member 'as and when' deemed appropriate.

## 8. **RESPONSIBILITIES**

8.1 It is the responsibility of the whistle-blower to act in good faith and not to make false accusations while reporting misconduct by a Fund employee.

8.2 It is the responsibility of Whistleblowing Committee to:

- a. Treat all reported concerns in confidence;
- b. Verify the background of the reported concern;
- c. Verify all the documents submitted as a proof; and
- d. Make every effort not to reveal the employees' identity if they so wish.

8.3 It is the responsibility of Human Resource and Administration Departments to provide necessary support to the Whistleblowing Committee in executing and concluding the reported concern.

## 9. **METHODOLOGY**

### 9.1 Raising a Concern

- a. Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Fund, the Fund Implementation Partners, vendors, shareholders, employees or the public at large;
- b. No anonymous complaint will be considered.

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- c. Although the whistle-blower is not expected to prove the truth of an allegation, he / she would need to demonstrate to the Compliance Officer that there are sufficient grounds for concern.

9.2 Methods of Reporting a Concern

- a. Any allegation may be based on first-hand, direct information, or on other information from any source that the reporting person reasonably believes to be credible; and can furnish substantial evidence to the same effect
- b. Acts of misconduct may be disclosed in writing by:
- i. Courier;
  - ii. Electronically by email
  - iii. Drop box; or
  - iv. In person to the Compliance Officer.

However, all reports are encouraged to be made in writing, so as to assure a clear understanding of the issues raised. The Form provided in '**Annexure - B**' shall be used for reporting purposes.

9.3 Handling a Concern

- a. Each concern received by the Compliance Officer will be logged and assigned a code that will be used in subsequent investigation and reporting of the concern.
- b. The Compliance Officer will take appropriate steps to ensure that a paper or electronic copy of the reported concern is preserved.
- c. The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within three (3) working days.
- d. Upon receipt of a reported concern, the Compliance Officer shall conduct initial inquiries / assessment to determine whether further review and/or investigation is warranted based on gravity of the issues described in the reported concern.
- e. If the Compliance Officer determines that further review or Investigation of the matters raised in a reported concern would be appropriate under the circumstances, the Compliance officer will promptly notify the Whistleblowing Committee for commencement of investigation. The Prima Facie charges as determined under (d) above, the compliance officer shall ensure that the charges are communicated to the accused and the Whistleblowing Committee

  
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- f. The Compliance Officer will have the authority to utilize the services of any Fund's personnel under the circumstances so as to assist in evaluation of reported concern.
- g. At any time during a review and/or investigation of a report, the Compliance officer will notify the CEO and Concerned Head of Department of the receipt of a report and/or the progress or results of any review and/or investigation of the report. The concerned Head of Department will be provided with such level of detail as may be necessary to allow for appropriate consideration.
- h. At the conclusion of such review and/or investigation, the Compliance Officer will determine what, if any, remedial action is appropriate. All employees of the Fund have an obligation to cooperate and comply with any review / investigation initiated by the Compliance Officer and should keep the information as 'classified' to avoid any disciplinary action against them.
- i. The Compliance officer will update the whistle-blower regarding following details:  
  
Whether any initial enquiries have been made;  
  
Whether further investigations will take place or not; and  
  
In case, Compliance Officer does not intend to carry out further investigation, he / she shall provide a reason thereof.
- j. Investigation will be completed and report submitted to the CEO within thirty (30) days from the date of reported concern. Where the situation warrants, additional time will be allowed with the approval of CEO to complete the investigation.

## 10 **POSSIBLE OUTCOMES AFTER CONCLUDING THE REPORTED CONCERN**

10.1 There will be no adverse consequences for anyone who reports a whistleblowing concern in good faith. However, an employee who recklessly makes statements or disclosures that are not in good faith and / or without substantive proof may be subject to disciplinary procedures. Similarly, in case of such complaints lodged by outsiders, the Fund reserves the right to take appropriate legal action.

10.2 The following actions may be taken after investigation of the reported concern:

- a. Disciplinary action (up to and including dismissal) against the wrongdoer depending on the results of the investigation.

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- b. Disciplinary action (up to and including dismissal) against the whistle-blower if the claim is found to be malicious or mala fide otherwise not in good faith.

**11 EFFECTIVE DATE**

This policy shall be effective from the date of approval from Board of Directors.

  
Chief Executive Officer



  
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**Glossary of Terms**

In this Policy, following terms have been used with the meanings specified:

- a. **Accused**  
A person against whom a concern has been reported to the Whistleblowing Committee. It also includes an alleged beneficiary of fraud, improper conduct or wrongdoing.
- b. **Allegation**  
Accusing before proving with evidence.
- c. **Charge**  
A formal accusation duly reviewed and found competent by the Compliance Officer for further probe.
- d. **Compliance Officer**  
Compliance Officer shall be a person appointed by the CEO. This officer shall maintain a record of concerns raised and the outcome (but in a form which does not endanger the confidentiality of the employee raising the concern).
- e. **Concern**  
The information about any alleged fraud, improper conduct or wrongdoing.
- f. **Fraud**  
The commission of an illegal act or omission of legal duty by an employee of the Fund either for personal gain or for wilfully causing loss to the Fund. It also includes the untrue statements by a person, who did not believe the same to be true and active concealment of facts.
- g. **Good Faith**  
Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true. However, a report does not have to be proven to be true to be made in good faith.
- h. **Improper Conduct or Wrongdoing** Improper conduct or wrongdoing is:
  - a. Any fraudulent activity / theft / corruption including bribery;
  - b. A substantial mismanagement of resources;
  - c. Misuse of fund;
  - d. Improper conduct in Fund's operations; accounting; internal controls auditing; or financial reporting;
  - e. A civil wrong or criminal act;
  - f. An act detrimental to the interests of the Fund; and

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- g. Any other violation of Fund's Code of Conduct.
- i. **Malicious**  
Intended act to cause harm without justification and regard for legal rights.
- i. **Whistleblowing**  
The voluntary disclosure of a concern by a whistle-blower to the Whistleblowing Committee.
- j. **Whistle-blower**  
Any employee, director, related officer, contractor, FIP personnel, an ex-employee or any member of public, who makes or attempts to make a disclosure of improper conduct or wrongdoing or fraud to the Whistleblowing Committee.
- k. **Wrongdoer**  
A person against whom a concern has been established.

  
Chief Executive Officer



  
Company Secretary

**NATIONAL DISASTER RISK MANAGEMENT LIMITED****WHISTLEBLOWER'S COMPLAINT FORM**

Please provide the following details for any suspected serious misconduct or any breach of suspected breach of law or regulation that may adversely impact the Fund and submit directly to "Compliance Officer". You may be called upon to assist in the investigation, if required.

**Note:** Please follow the guidelines, laid down in the Whistleblower Policy.

**SECTION 1 - REPORTER'S CONTACT INFORMATION**

1.1 Name: \_\_\_\_\_ 1.2 Desig: \_\_\_\_\_  
 1.3 Dept: \_\_\_\_\_  
 1.4 CNIC: \_\_\_\_\_ 1.5 Tele: \_\_\_\_\_  
 1.6 Email: \_\_\_\_\_

**SECTION 2 - COMPLAINT AGAINST**

2.1 Name: \_\_\_\_\_ 2.2 Desig: \_\_\_\_\_ 2.3  
 Dept: \_\_\_\_\_  
 2.4 CNIC: \_\_\_\_\_ 2.5 Tele: \_\_\_\_\_ 2.6  
 Email: \_\_\_\_\_

**SECTION 3 - WITNESS'S INFORMATION (IF ANY)**

3.1 Name: \_\_\_\_\_ 3.2 Desig: \_\_\_\_\_ 3.3  
 Dept: \_\_\_\_\_  
 3.4 CNIC: \_\_\_\_\_ 3.5 Tele: \_\_\_\_\_ 3.6  
 Email: \_\_\_\_\_

**SECTION 4 - COMPLAINT**

In the following columns, please briefly explain the misconduct / improper activity observed. Also please intimate as how you came across about it. If there is more than one such allegation, indicate each allegation serially and use as many pages as necessary.

4.1 What misconduct / improper activity occurred?	4.2 Who committed the misconduct / improper activity?	Any other helpful details / info:
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____ 4.3	Where did it happen?	4.4 When did it happen?
_____	_____	_____
_____	_____	_____

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_____	_____	_____
_____	_____	_____
_____	4.5 When did you notice it?	_____
_____		_____
_____		_____
_____		_____
_____	4.6 Are there any other party(ies) involved in this?	_____
_____		_____
_____		_____
_____		_____
_____	4.9	Signatures (Optional):
_____	_____	_____
_____	_____	_____
_____	4.7 Is there any evidence that you can share*?	_____
_____		_____
_____	4.10	Date:
_____	_____	_____
_____	_____	_____

\* You **SHOULD NOT** attempt to obtain evidence for which you do not have a right of access since '**whistleblowers**' are 'reporting parties' and NOT 'investigators'.



Chief Executive Officer





Company Secretary