



**ALFALAH INSURANCE COMPANY LIMITED  
WHISTLEBLOWING POLICY**

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## 1. INTRODUCTION

Alfalah Insurance Company Limited is committed to maintaining high standards of honesty, integrity, and ethical conduct in all its operations. This whistleblowing Policy aims to reinforce these values by encouraging employees, customers, service providers, vendors, shareholders and external stakeholders to report any suspected misconduct, illegal activities, or breaches of AFICL policies and code of conduct. The policy provides a safe channel for raising concerns, ensuring that whistleblowers are protected from retaliation and vengeance while maintaining the confidentiality of their identity.

This policy is designed to encourage transparency and enable the AFICL staff and associated parties to speak up against financial malpractices, fraud, personnel harassment, or any other improper behavior. AFICL firmly believes that safeguarding the organization's reputation and assets is a collective responsibility, and whistleblowers play a critical role in maintaining the trust and integrity that the organization is built on.

Employees, vendor, service providers, and external stakeholders are encouraged to raise concerns in good faith and follow the prescribed channels without fear of reprisal or any adverse consequences. By reporting misconduct, they contribute towards ensuring that AFICL remains a trustworthy and ethical organization that adheres to all applicable laws, regulations, and internal policies.

## 2. SCOPE

This whistleblowing policy applies to all AFICL stakeholders, including but not limited to:

- Permanent, temporary, and the Company's contractual employees
- Vendors and service providers
- Customers and shareholders
- General public interacting with the Company in any capacity

The policy is effective across all domestic operations of the AFICL. It covers reporting of suspected violations including, but not limited to, fraud, misrepresentation, forgery, theft, corruption, dishonesty, collusive practices, and unauthorized sharing of confidential information.

## 3. POLICY OBJECTIVE

The primary objective of the whistleblowing policy is to encourage and facilitate the reporting of unethical or unlawful practices within AFICL. It aims to:

- Foster a culture of accountability and transparency.
- Ensure that all concerns are addressed without fear of retaliation and vengeance.
- Encourage individuals to disclose any misconduct they observe or suspect in a responsible and timely manner.
- Protect whistleblowers from any negative consequences resulting from their reports.
- Provide clear procedures for raising concerns and handling whistleblowing complaints.



#### 4. PROCEDURE FOR REPORTING COMPLAINTS

##### 4.1 Whistleblowing Channels

AFICL has established the following communication channels for submitting complaints confidentially:

- **Mail:** Whistleblowers can write to the following address:

“CONFIDENTIAL”

**Chairman Board Audit Committee,  
Alfalah Insurance Company Limited,  
5-Saint Mary Park, Gulberg-III, Lahore  
Phone: +92 42 111-234-222**

- **Email:** Send emails to [whistleblowing@alfalahinsurance.com](mailto:whistleblowing@alfalahinsurance.com)

In cases where the complaint involves senior management or internal audit personnel, the complaint will be directly escalated to the Chairman Board Audit Committee (BAC).

##### 4.2 Anonymity and Confidentiality

Whistleblowers may choose to remain anonymous; however, complaints made anonymously must provide sufficient evidence to initiate an investigation. Whistleblowers are strongly encouraged to disclose their identity to facilitate the investigation process, with assurances that their identity will remain confidential unless consented by the complainant/legally mandated otherwise.

Only those anonymous complaints with material evidence or concrete facts will be considered for investigation. AFICL takes reasonable steps to ensure that whistleblowers do not face any detriment because of their disclosures.

#### 5. INVESTIGATION PROCESS

Once a complaint is received, BAC or a designated representative will review and assess its seriousness, credibility, and evidence. The investigation process involves:

- **Initial Review:** A preliminary assessment will be conducted to determine whether the complaint merits further investigation. If required, Chairman BAC will assign investigation to head of internal audit or to respective division such as HR for grievances/harassment complaints as the case maybe.
- **Confidential Inquiry:** The investigation will be carried out discreetly, with access to the identity of the whistleblower limited to authorized personnel.
- **Reporting:** The findings of the investigation will be shared with the relevant department and reviewed by the Board Audit Committee. The Board Audit Committee has the authority to advise corrective actions and ensure that records of complaints and investigations are properly maintained. In case the whistle blow is against top management or internal audit personnel, the investigation mode and procedure will be decided by BAC/Chairman BAC.

#### 6. PROTECTION AGAINST RETALIATION & VENGEANCE

AFICL strictly prohibits retaliation and vengeance against any individual who raises a concern in good faith. Whistleblowers who are victimized because of their disclosure should report such



incidents through the established whistleblowing channels, and AFICL will take immediate steps to investigate and address any form of retaliation and vengeance.

Employees who retaliate against whistleblowers will be subject to disciplinary action.

#### **7. REWARD/ACTION FOR/AGAINST WHISTLEBLOWERS**

**Reward:** Whistleblowers may be rewarded for bringing significant and critical issues to the Company's attention. The reward is discretionary, depending on factors such as the gravity of the reported issue, its potential impact on AFICL and the extent to which the complaint can be corroborated.

**Actions:** In situations where the complaint lodged is proved to be false and there is sufficient evidence to infer that false complaint was lodged with malicious intentions (or just to equal any personal scores) then a suitable disciplinary action will be recommended to the human resources department against the staff involved or recommend legal action to relevant department in case of the vendor and/or outside service provider who lodged false complaint with malicious intentions.

#### **8. RECORD KEEPING**

BAC of AFICL will maintain a complete record of all complaints, including:

- Identity of the whistleblower (if provided)
- Nature of the concern raised
- Findings of the investigation
- Actions taken because of the complaint

All complaints eligible under this policy will be discussed in BAC and reported to Chairman Board Audit Committee on quarterly basis. However, any critical instance will be reported to Chairman immediately.

#### **9. MODIFICATIONS AND UPDATES**

The BAC is responsible for maintaining and updating this policy. Changes to relevant regulatory requirements or internal practices may necessitate revisions to this policy, which will be approved by the Board of Directors on the recommendation of the Board Audit Committee.



## DEFINITIONS

- **Whistleblowing:** The act of exposing or disclosing any information or activity that may be harmful to the organization, including any mismanagement, corruption, money laundering, Hawala, illegality, or wrongdoing.
- **Whistleblower:** A person or institution disclosing criminal or improper activities within the organization. This may include current or former employees, vendors, customers, or any other stakeholder.
- **Good Faith:** Information shared with honesty and objectivity, without any deliberate intent to deceive or defraud. A good faith report may not always prove true, but it is made with genuine belief.
- **Protection:** Reasonable steps taken by AFICL to ensure the confidentiality of the whistleblower and safeguard them from professional harm.
- **Stakeholders:** Includes all employees, customers, vendors and other representatives of AFICL.
- **Fraud:** Any act or omission that knowingly misleads or attempts to mislead for financial gain or to avoid an obligation.
- **Misrepresentation:** A false statement or omission of fact made with the intention to deceive.
- **Forgery:** The process of creating a false document with intent to deceive.
- **Theft:** The unlawful taking of property or goods.
- **Corruption:** The offering, giving, receiving, or soliciting of anything of value to influence improperly the actions of another party.
- **Collusive Practices:** Agreements between parties to achieve improper objectives, including influencing the actions of others.



## APPENDIX - QUESTIONS AND ANSWERS

To facilitate better understanding and implementation of the Policy, a set of Q&A, are compiled below.

However, if any employee has any other question/query regarding the policy, he/she can freely approach the Board Audit Committee of AFICL.

### What issues should I raise to higher management?

Any actual or planned wrongdoing or bad practice which:

- Is against the law.
- Is against regulatory requirements
- Is against the Company's internal policies/procedures
- Is against the Company's Code of Conduct or general market ethics or standards of practice. (professional misconduct)
- Cause any financial/reputational loss to the Company.

### To whom shall I escalate the issue?

You are encouraged to escalate the above issues at the email address [whistleblowing@alfalahinsurance.com](mailto:whistleblowing@alfalahinsurance.com). All mails sent on this address shall directly go to the mailbox of the Chairman Board Audit Committee (BAC).

Alternatively, you can write on the following address, marking the envelope:

**'CONFIDENTIAL'**

**Chairman Board Audit Committee,**

**Alfalah Insurance Company Limited,**

5-Saint Mary Park, Gulberg-III, Lahore

Phone: +92 42 111-234-222

### What if I have a grievance?

The system is not intended to deal with staff grievances, which should be raised with HR or the line manager.

### What if I'm not sure of my facts?

You don't have to be 100% sure; however, you should have reasonable grounds for your suspicion. So, if you have genuine suspicion then you should come forward and explain your concerns. It may just be a mistake in the system or process, rather than deliberate wrongdoing. You will not be blamed for not being 100% sure.



**What if I come to know or have reasonable grounds to believe that an undesirable activity is taking place and still do not 'blow the whistle'?**

As an employee of the Company, it is your responsibility to escalate a 'wrongdoing' to the senior management, if you have reasonable suspicion. You may take time to form your opinion or muster the courage to report the issue, but you SHOULD do it. Observing an illegal/unethical activity and keeping silent reflects adversely on your own professional conduct and maybe construed as connivance and/or collusion. In some cases, you may even be legally obliged to report the incident.

**Won't I be thought malicious?**

If you genuinely act in the best interests of the Company and its employees, then your actions will be viewed as courageous, not malicious. However, this channel should not be used to vilify co-employees/higher management with whom you may hold a personal grudge.

**Wouldn't it be disloyal?**

No - quite the opposite! Your action will help to protect the interests of our AFICL. Individuals involved in wrongful behavior are the ones who are being disloyal. They are putting at risk not only the achievements of their business/branch but possibly also those of AFIC COMPANY as a whole apart from exposing to regulatory and legal risk.

**What will happen next?**

Board Audit Committee or any of its designated senior officer(s) will discuss with you whether anyone else needs to be put in the picture in order for your suspicions to be investigated and, if so, who. They will not mention your involvement to your line manager or anyone else implicated without your consent.

**Will it be in confidence?**

Every effort will be made to protect your confidence. The principle will always be to involve as few people as possible. Although you may be asked if you can provide further information, but you will not be directly involved in the investigation.

**What will be the consequences for me?**

You will not be blamed for speaking up or for any failure to speak up earlier. Staff may have taken time to form their suspicions, or to build up the courage to act on them. However, those who have been actively involved in wrongdoing will not have automatic immunity from disciplinary/legal action, as the case may be. Generally, when someone admits to a wrongdoing he been involved in, it is looked upon positively by the management and any action against such a person is not as severe as when the issue is discovered by the management itself. In some cases, you may even be rewarded if your act of blowing the whistle saves the Company from financial or reputational failure.

**How will I know whether action has been taken?**

The Department investigating the matter will give you feedback on the outcome. Investigation may take some time, but you will be told in due course whether your suspicions were well- founded and (where possible), what action is being taken about them.