

# WHISTLE BLOWING

## 1.0 PURPOSE

This policy is for employees who wish to voluntarily provide information relating to any misconduct or fraudulent activity involving the Company. This policy stands for "making a disclosure to safeguard common interest". It serves to create an atmosphere of openness and trust and to maintain a safe and effective environment in the Company.

## 2.0 ELIGIBILITY

All Staff

## 3.0 FEATURES OF POLICY

- 3.1 To provide an opportunity for confidential submission of complaints to the Company on any concern regarding questionable practices or fraudulent activities
- 3.2 To report any misconduct or concern about an employee's actions which can be considered as questionable, misleading or fraudulent, without regard to the position of the person(s) responsible.
- 3.3 All reports are expected to be made in good faith. The information is required to be factual rather than speculative and may be presented along with supporting evidence/proof, including, name(s), dates, places, events, person's perception of why he/she suspects the fraud, illegality or other wrongdoing.
- 3.4 The confidentiality of the whistleblower's identity, the nature of the report, and the suspected/alleged person's identity shall be strictly maintained to the extent that it is lawful and the investigative process allows.
- 3.5 The whistleblower must mention his/her real identification otherwise complaint(s) will not be entertained. Anonymous emails or mails will also be not considered.
- 3.6 All complaints should be forwarded to immediate supervisor / Department Manager. If employee doesn't get satisfactory response then he/she has the right to approach concerned Department Head. If the complainant is still not satisfied then complaint may be launched to Head of HR.
- 3.7 All complaints are to be reported to whistleblower@berger.com.pk or mailed to the Head of Human Resource Department at **BERGER Paints Pakistan Limited**'s head office address:  
**BERGER Paints Pakistan Limited**  
Head of Human Resource  
36 Industrial Estate, Kot Lakhpat  
Lahore

## | EMPLOYEE BENEFITS POLICY |

- 3.8 Upon notification of complaint, a confidential and impartial investigation will be promptly commenced through an Inquiry Committee. This committee comprises of:
- Chief Operating Officer
  - Head Of HR
  - Assistant Manager Administration
- 3.9 The investigation may include direct interviews with involved parties and where necessary with employees who may be witnessed or have knowledge of matters relating to the complaint.
- 3.10 The parties of the complaint will be notified of the findings and the decision taken by the Inquiry Committee.

In addition to the aforesaid terms and conditions, the Company reserves the right to amend or change this policy, rules & regulations, without any prior notice, at its sole discretion, and the amended rules & regulations shall take precedence over the previous one.



**Dr. Mahmood Ahmad**  
Managing Director

Effective Date:	October 15, 2017	
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