

**NRSP**

*Grievance  
Redressal  
System (GRS)  
Policy*

## NRSP– Grievance Redressal System (GRS)Policy

### **Policy Statement:**

NRSP Grievance Redressal System (“GRS”) (formerly called as the Complaint Management System) was established in 2013 (*The procedures were formally approved on 5<sup>th</sup> April 2013 by the Audit Committee in its 10th Audit Committee Meeting*). This present policy encompasses all the improvements and changes brought over time by the National Rural Support Programme, henceforth “NRSP” to keep this policy document at par with SECP guidelines (Circular # 24 of 2018) and in line with sector and international standards.

This policy provides guidance to all the employees, staff, third parties, donor agencies and stakeholders of NRSP. It intends to outline and be applied as a best practice approach and framework to deal with issues that may arise as part of having a working business relationship with NRSP.

Our aim through the mechanism of this Grievance Redressal System is to specifically provide a fair process for members of staff and employees to obtain a speedy resolution to problems or concerns relating to their employment.

## **I. Introduction:**

Grievance Redressal System (GRS) of NRSP encompasses policies and procedures related to receiving, processing, handling, management, and redressal of complaints/ grievances filed by or received from customers, third parties, members of community institutions, employees, donor agencies and other stakeholders.

The purpose of this Policy is to ensure that all the staff, customers, donor agencies, third parties and relevant stakeholders are given a fair opportunity to raise concerns to NRSP in an equitable and fair manner.

### **1. Grievance Redressal System:**

As a policy, NRSP ensures its GRS to be efficient and effective while complying with the standards of fairness, transparency and accessibility for increased user satisfaction and organizational reputation. The GRS is designed to bring a grievance/ complaint to a resolution and to the mutual benefit of all stakeholders and third parties.

The scope of GRS is limited to operations of NRSP directly managed by its organizational staff. GRS will not apply to, register and/or follow up on the complaints related to subsidiary and associated companies of NRSP and/or government line agencies, partner agencies or contracted vendors insofar as they do not relate to the operations of NRSP in any manner or form. The complainants are informed to directly contact the relevant institutions to the extent of such complaints. As a policy, GRS shall not entertain issues pending under any Court of Law or government like agencies unless there are compelling reasons to do so provided no legal bar exists and that such will not prejudice pending legal proceedings, if any.

For all complaints or grievances filed, GRS registers and maintains a record of such complaints which may include details relating to the policies, planning or occurrence of fraudulent activity, misconduct, seeking favors by organizational staff as reward, threats or acts of sexual harassment and unprofessional attitude etc.

## **II. Complaint Cell:**

The Complaint Cell works as an independent oversight body primarily tasked with investigating allegations of sexual harassment, bribery, fraud and corruption and other prohibited practices including coercive and collusive practices, abuse, conflict of interest and retaliation against whistle-blowers. This is in line with best practices of corporate governance.

The Complaint Cell is led by the Head of Complaint Cell, who is the primary focal person responsible for leading and directing the Cell. This includes *inter alia*:

1. Registration of the complaint;
2. Overall management of the complaint handling system;
3. Initial screening of the complaint according to standard requirements;
4. Requiring an impartial and unbiased investigation to validate and authenticate the Complaint and/ or require additional documents from the complainant;

5. Processing the complaint for further action where the case for an alleged offence has been substantially made out;
6. Timely settlement of complaints; and
7. The Head is also responsible for sharing data of settled and un-settled complaints with the Audit Committee of the Board of Directors (BoD) and CEO where required.

The Head of Complaint Cell acts as an independent entity responsible for ensuring that complaints are vetted and judged in an impartial and objective manner to determine whether a complaint or grievance is fit to be entertained, and proceed with the initial stages of investigation.

In order for the independence of the Head of the complaint cell to be maintained, NRSP has ensured that the incumbent Head may not be removed from office during his/ her term, except for malpractice. Furthermore, only the Board may decide to terminate the contract based on the evaluation of the performance of the Head in relation to an agreed performance-based contract.

It is the decision of the Head of the Complaint Cell to determine the merits of each complaint and decide whether the complaint demands further action including initializing a thorough investigation or whether the complaint can be dealt with swiftly in the early stage or the complaint is not to be entertained reasons being.

All persons shall make themselves available for questions and elevate issues or allegations immediately to the proper level. Everyone must take great care in handling ethical, racist, fraudulent, and sexual harassment issues and safeguarding complainants from threats of retaliation.

**1. The Complaint Cell has been authorized to do the following: -**

- i. Register or refuse registration of complaint. The Complaint Cell shall have the right to refuse or not entertain any anonymous complaints / generalized complaints or complaints not relevant to affairs of NRSP.
- ii. In order for a complaint to be relevant and considered, it is recommended that a standard complaint form be used.
- iii. A complaint that is lodged or a grievance that is filed should have certain mandatory information in order for it to be processed and assessed. No anonymous complaints or grievances shall be entertained.
- iv. To commission an inquiry or investigation on the complaint.
- v. Accept/ reject or require additional information from responding officials on the complaints referred to them.
- vi. Head of the Complaint Cell is authorized to determine and send unresolved complaints to the higher level i.e. Audit Committee of the Board.
- vii. The Complaint Cell is authorized to make improvement by bringing in technology and resources for management of complaints.

## **2. Internal Audit**

Internal Audit is responsible for carrying out independent review of complaint management system on a yearly basis. During the course of internal audit, the auditors may randomly contact the complainants (both in person and on phone) on sample basis for cross verification of data reported in GRS. Internal Auditors, as per their mandate, are also authorized to conduct independent inquiries and investigations related to GRS.

## **III. Procedures/ Mechanism of Complaints:**

At NRSP, we have developed two (2) different reporting mechanisms or procedure categories in order to deal with the complaints and grievances. As stated earlier, the purpose of this policy document is to redress matters in an appropriate and timely manner.

Hence, this dual approach concerning GRS will allow NRSP to filter out trivial matters from those requiring serious deliberation, hence, allowing NRSP to operate in viably and efficiently, utilizing resources only when absolutely necessary.

### **1. Informal procedure:**

If there is any concern regarding your employment or any complaint, NRSP encourages that you should generally discuss these matters in an informal and speedy manner with your concerned supervisor, head or relevant authority. The reason to adopt an informal channel is to minimize the loss of time, allow for amicable and easy settlement of trivial issues that would otherwise become unnecessary complicated. Matters that have a reasonable chance of being redressed and resolved informally may include concerns about working conditions, pay, health, remuneration, and toxic work environment and/ or other day to day and routine matters.

### **2. Formal Procedure:**

If it appears that the complaint remains unresolved through the informal procedure or pertains to other matters of a nature which should not be dealt without a formal procedure and grievance or complaint and/ or such would be detrimental to NRSP and/ or to the complainant if not resolved, the complainant should follow the formal procedure to lodge complaint and grievance.

The formal Complaint procedure is as follows:

#### **a. Complaint received by the Complaint Cell**

It is recommended that any employee, staff member or person aggrieved should file a grievance or complaint to the Complaint Cell.

A grievance should normally be raised within two (2) months of the issue having arisen or when the most recent incident has taken place. NRSP reserves the right not to entertain or process any grievance if it has not been raised in a timely manner.

**Complaints:** Any aggrieved employee, customer, donor agencies or third parties can report or file any grievance or complaint against any violation, fraud corruption, bribery or misconduct in reference with NRSP activities or operations or that of its executing entities.

This has been made possible with a centralized system of NRSP to manage the grievance and complaint filed through the prescribed centralized sources of communication (whether verbal or in writing) via SMS, email, recorded line or surface mail or any other agreed channel as per following:-

- a. A dedicated centralized e-mail address (complaints@nrsp.org.pk);
- b. A dedicated SMS service link with Complaint Cell portal;
- c. A direct and universal landline number;
- d. A written complaint at the link given on website and displayed in offices;
- e. A dedicated Whatsapp service number or group (to be given) that can be conveniently scanned and the complaint can be sent directly; and
- f. In person complaints can be filed with the Complaint Cell directly by completing a Grievance/ Complaint Form, available at Head Office, all District, and Regional offices. The concerned Heads of the Regional and District Offices are required to ensure that these forms are readily and easily available and accessible at all times for employees across the hierarchy.
- g. The helpline stated above are monitored by the Head of the Complaint Cell. Other ways to make a complaint includes:

By post marked “*Private & Confidential*” a complaint form addressed to the Complaint Cell.

- i. The details of complainants received, along with their current status (whether open or closed) is shared with Audit Committee members in quarterly Audit Committee Meetings. These details are also recorded in the minutes of Audit Committee.
- ii. Complaints or grievances attracting policy response, or an executive decision are required to be forwarded to Audit Committee.

All the received complaints must be acknowledged.

Resolution Time Line:

Following timelines may be observed for all complaints.

Acknowledgement	Within one (1) working day. In case of complaints received outside working hours, the next working day would be considered its receipt day.
Interim reply	If the complaint requires detailed scrutiny, then within five (5) working days shall inform the complainant that the complaint requires detailed scrutiny.

Final reply	Complaints that do not require detailed scrutiny: fifteen (15) working days. Complaints which require detailed scrutiny thirty (30) working days.
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During this time period, the complaint shall be considered as open and referred.

The Head of the Complaint Cell should undertake a preliminary investigation. Where, upon completion of the preliminary investigation, it is reasonably established that the complaint does not have merits, the Head of the Complaint Cell shall send an email to the Internal Auditor for his/ her record. The Internal Auditor may then decide whether any further action, in the matter, is required or not.

In certain cases, where the matter is trivial and does not include allegations of fraud, embezzlement or sexual harassment, the Head of the Complaint Cell may seek to resolve the matter before referring to an investigation committee. Unless the policy provides otherwise, the complaint will go to the Investigation in matters involving serious allegations.

NRSP discourages anonymous allegations. Issues expressed anonymously will be considered at the discretion of NRSP. In exercising this discretion, the factors to be considered will include:

- a. The seriousness of the issues raised;
- b. The credibility of the allegations and the supporting facts; and
- c. The likelihood of confirming the allegation from attributable sources.

Where, in the view of the Complaint Cell, the matter cannot be adequately investigated without further information, the Head of the Complaint Cell shall send an email to the Internal Auditor for his/ her record. The Internal Auditor may then decide whether any further action, in the matter, is required or not.

**3. Investigation:**

Where required, the Head of the Complaint Cell shall constitute an Investigation Committee to investigate the matter at hand. The Investigation Committee shall determine the merits of the complaint and assess or require any further evidence. During this time period, the complaint shall be considered as pending.

**4. Report by the Committee:**

The Investigation Committee upon competition shall prepare a report that would contain its findings. If the complaint needs no further resolution or it is trivial to proceed, it shall be considered as closed and the complainant will be informed. However, if the reports suggest further process, then the matter will be forwarded for disciplinary action.

#### **IV. Structure:**

The GRS is supervised by a Head Office (HO) based senior executive nominated by CEO in consultation with Audit Committee. Currently, the Head of Human Resource (HR) is supervising/heading the GRS.

NRSP- Grievance Redressal System (GRS) addresses two (2) broad categories:

#### **A. Grievances from Employees and Former Employees: -**

For the purpose of management of grievances, grievance defined as (but not limited to) formal complaint raised by an employee with regards to abuse of authority, fraud or corruption and bribery, bullying and hostile work place environment, discriminating attitude and work place harassment by colleagues or supervisor.

#### **B. Complaints from Customers, Beneficiaries and Third Parties:**

For the purpose of management of complaints, complaint is defined as an oral or written expression of dissatisfaction relating micro-financing issues and its ancillary matters received either from a customer, beneficiary or a third-party where a response or resolution is expected.

A client/ customer is defined as 'a person who has obtained finance from NRSP'.

Complaints brought in by the beneficiaries will be dealt with by the Monitoring and Evaluation department.

Third-Party is defined as 'any person or a legal entity that has an existing business relationship with the NRSP including bidders, suppliers, consultants, contractors, service provider and/or their personnel, employees and representatives or agents'.

The complaint management for the redressal of customers and third-party are similar to the grievances by the employees and staff members. All complaint are to be made to the Complaint Cell. Customers or third parties can file a complaint by utilizing the mentioned communication channels designated by the NRSP. For such purposes, a focal person nominated by Head of the Complaint Cell of NRSP, shall act as a liaison officer between the customers/ third parties in order for speedy redressal of the grievances. The focal person shall deal with matters primarily pertaining to project issues and micro-financing problems that are faced by the third-party.

NRSP reserves the right to reject or refuse to award, suspend or terminate the contract/ agreement, at any time and/ or at any stage of the performance of the contract/ agreement where, it becomes apparent that a third-party either directly or indirectly, on its own or through its employee or agent or representative has directly or indirectly been involved in, engaged or facilitated/ abetted, aided any:

1. Corrupt, collusive, coercive, or obstructive practices;
2. Illegal means to obtain or compete for the contract/agreement, grant, financial benefit or win a tender etc.;
3. Fraud, Corrupt practices, and Bribery; or
4. Sexual Exploitation and Harassment.



The Progress on GRS shall be reviewed by Audit Committee of the Board in their quarterly meetings as a separate agenda item and shall be included in the working papers/ Committee meeting minutes. The Chairperson Audit Committee may recommend discussion points related to GRS in Board Meetings.

### **1. Monitoring/assessing Complaint Handling Mechanism:**

- i. The performance of GRS is reviewed on quarterly basis by Audit Committee as an agenda of Compliance Review.
- ii. The complaint handling mechanism is also subject to internal audit annually and any deviation or non-compliance of internal procedures as well as legal/ regulatory requirements is reported to BoD through Committees.
- iii. The Complaint data is also reviewed during the course of operational audits.

### **2. Roles and Responsibilities:**

#### **3. Board of Directors**

The Board of Directors (BoD) is responsible for reviewing and approving policy matters and providing guidelines to management on GRS. The policy matters requiring guidance of the Board are presented in the Board meetings by the Chairperson. The Board is responsible for setting and reinforcing a culture of ethical behavior and compliance.

#### **4. Audit Committee**

The Audit Committee of the Board is tasked by the Board to review the details of complaints and grievances (if any) during their quarterly held meeting. The Complaint Cell shall prepare a summary of complaints received, forwarded and closed during a given time frame. Unresolved complaints (exceeding 90 days) are brought for specific attention of the Audit Committee. The Audit Committee also determines whether GRS is working in appropriate manner or needs some improvements.

#### **5. Chief Executive Officer**

NRSP has a decentralized way of working where each regional and district head is authorized to locally handle the affairs of the respective region. However, all such powers by regional heads are drawn from CEO. The unsettled procedural complaints and grievance are dealt by the CEO of NRSP as the final authority to decide such matters. In addition, the CEO acts as an arbitrator between compliant cell and field teams as and when required.

### **v. Investigation Process:**

The purpose of the investigation, which may be required by the Complaint Cell is to determine whether an allegation of reported or suspected misconduct or conduct reported by the complainant can be substantiated or not.

This will be done by assessing the complaint along with available evidence provided by the complainant. The purpose is to filter out non-serious and trivial matters and to resolve or deal with matters that can have significant and damaging impact for NRSP and its operation.

This initial investigation will ensure that a fair and objective manner is adopted to assess the potential area of concern. Investigation will commence once the Complaint Cell has received the stated grievance of the complaint against the respondent. In order to maintain a just and equitable process of investigation:

1. Anonymous complaints will not be handled or even be considered by the Complaint cell for further process.
2. The complainant needs to state or provide material evidence and tangible facts. Complaints on mere hearsay or subjective opinion will not be entertained.
3. Profiling of the complaint may be necessary for the investigation of the complaint. The profile of the complainant would only be known to selected individuals and staff members involved in the process, in order to maintain privacy.
4. An important aspect of the investigation process is that all the tangible facts and evidence that the complainant intends to share or expose, shall be stated in writing on a stamp paper, and duly witnessed. This shall be procured where the matter is referred to an investigation team.
5. Where a complaint has been initiated and merits tangible facts, it may not be closed even when the complainant subsequently withdraws the same. In such cases, the matter will be referred to the CEO to decide whether to close the complaint or continue with the investigation. The CEO may refer the matter to the Internal Auditor to make this decision.

Depending on the nature of the Complaint, Head of the Complaint Cell, will determine the investigation modalities and if necessary, constitute an Investigation team to investigate the offence and report its findings and recommendations.

The Investigation Team shall be headed by the Head of the Complaint Cell. The structure would ideally comprise of at least three (3) members including a senior member from the HR department and senior supervisors from different departments. Of the three (3) members, at least one member shall be female (subject to certain operational exceptions) in order to maintain the gender equality principle of NRSP.

The Investigation Committee once constituted shall follow up on further information and report its findings. To the extent possible, when the Investigation Committee will hold discussions, such will be audio recorded, and the interviewee shall be informed of this prior to the commencement of such recording, whether it is the complainant, respondent, or other persons.

In order to maintain impartiality and ensure transparency, the complainant, or the respondent, as the case may be, shall be given an opportunity to make any comments or raise any matter regarding the investigation.

Any issue or complaint should be noted and recorded by the Investigation Team. A written record of the Complaint(s) shall be communicated to the Head of the Complaint Cell and if not present, to their delegate.

If the Investigation Team finds that the complaint holds solid ground, then once the findings are reported, a show-cause shall be served to the respondent in accordance with the HR Manual. The matter will proceed to an Inquiry Committee for further necessary actions.

It is not necessary that a complaint that has been dealt by the Investigation Team will go to the Inquiry stage. The Head of the Complaint Cell can seek advice from the Legal Advisors for determining whether a particular complaint should be forwarded for further action or be closed, based on the available evidence and nature of the accusation levied.

**Grievance Meeting and Redressal:**

In certain cases, it may be necessary to hold a Grievance Meeting in order to further ascertain the merits of the concern raised, and/or require additional evidence or explanation, to understand the matter in much more depth. It is important, as this meeting will allow you the opportunity to express your concerns and provide any evidence or witness you may have.

If the complainant is unavailable or unwilling to attend the Inquiry meeting without showing any good cause, the matter will be decided based on the available evidence, in your absence. The interim decision, or final decision if no further proceedings are necessary, will be communicated to you. Otherwise, if further investigation is mandated, then the matter will be sent to the requisite Inquiry Committee.

**VI. Inquiry Committee and Procedures:**

Once the Investigation has been concluded, the Investigation Team shall prepare a report which shall be presented as a starting point for the Inquiry proceedings. The report shall detail all aspects of the complaint including the merits, the standard of evidence presented and any further recommendation necessary that may prove helpful to the Inquiry Committee.

The Inquiry proceedings will be initiated once it appears that the complaint is based on tangible facts and concrete evidence and therefore requires further actions to be taken. The Inquiry shall be conducted by an Inquiry Committee.

The Inquiry Committee shall be constituted by the General Manager of NRSP. Any Inquiry Committee constituted shall have at least one female member. In matters relating to Sexual Harassment, the Inquiry Committee shall have at least two (2) female members.

**Appeal:**

If the complainant is dissatisfied with the outcome, he/ she may appeal in writing to the CEO within five (5) working days of receiving the Company's response to their grievance. The appeal should outline the basis for the appeal. The CEO may refer to the appeal to the Internal Auditor or the General Manager of NRSP for a decision.

- iii. The details of complainants received, along with their current status (whether open or closed) are shared with Audit Committee members in quarterly held Audit Committee Meetings. These details are also recorded in minutes of Audit Committee.
- iv. Complaints or grievances attracting policy response or an executive decision are required to be forwarded to Audit Committee.

**VII. Punishments:**

A misstep by a single employee can cost the company dearly; it undermines all aspects of its reputation. For these reasons, violation of any of the clauses of the 'HR Manual all accompanying policies' by any employee may lead to significant action.

In the event an employee's performance is non-compliant with professional conduct standards set out in the policies of NRSP, the employee may be subject to disciplinary action.

An employee who compromises or violates the law, company policies relating to the conduct of its business, or any of the clauses of this 'HR Manual or any of its policies' will be liable to strict disciplinary action, leading to any one of (or a combination of more than one) punishments.

As outlined, when an employee is considered to have committed an offense or where an employee is found guilty of misconduct or has breached any of the policies or the HR Manual the employee is liable to any or a combination of the following punishments (depending on the policy breached):

- ❖ Immediate Termination
- ❖ Suspension
- ❖ Warning
- ❖ Fine/Penalty
- ❖ With-holding of increment or promotion for a specified period not exceeding 1 year
- ❖ Reduction to a lower post (Demotion)
- ❖ Dismissal without payment of any compensation in lieu of notice
- ❖ Administrative action such as ban on holding a specific functional, geographical jurisdiction position and transferring to such positions or places

Where a complaint has been processed, investigated and found to be genuine and made in good faith, NRSP shall hold accountable the concerned person against whom the complaint is made and found to be genuine, the following process is adopted:

1. A written warning letter stating the reasons for the letter and the result of the initial inquiry. It requires that the concerned person should respond within one (1) week in written form (preferably on a standardized form).
2. If it appears that no further action or proceedings is necessary, depending upon the nature of complaint the matter can be closed or a warning or penalty can be awarded.
3. A show-cause notice requiring the person against whom the complaint is made regarding him/ her.
4. Upon receiving the show-cause, the concerned person is required to file a reply within seven (07) working days and to attend a hearing before the Inquiry Committee thereafter.

Apart from the redressal mechanism within the organization the complainant has the access to other judicial or administrative remedies that are available under the law or through existing arbitration procedures. Information of such forums are publically available e.g.:-

- a. Security Exchange and Commission of Pakistan (SECP) Complaint Cell – Contact details mentioned on the main page of NRSP-Website
- b. Prime Minister’s Portal
- c. In case of Harassment, Office of Federal Ombudsman for Protection against Sexual Harassment (FoSPAH).

## **Specific Policies:**

### **1. Protection against Sexual Exploitation & Harassment:**

NRSP provides equal opportunities to men and women and for this purpose, such rules and procedures have been proposed that enable both men and women to show their potential. In some areas where female mobility is restricted or literacy levels are low or they face any constraints that hinder their performance, the NRSP management is allowed to relax rules as compared to those applicable to men to bring women at par with men.

NRSP requires all of its employees to abstain/ refrain from all and any sort of harassment of employees in the workplace based on biases such as sex, race, color, ethnicity, caste, ancestry, religion, age, disability or marital status.

NRSP fully complies with the Protection against Harassment of Women at Workplace Act, 2010 (hereinafter ‘Act’) with amendments as up to date.

#### **i. Definitions:**

Sexual Harassment is defined under subsection 2(h) of the Act *‘as any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment’.*

Sexual Exploitation means *‘any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another’.* Sexual exploitation is a broad term, which includes a number of acts, including; transactional sex, solicitation of transactional sex and exploitative relationship.

Sexual Abuse means the *actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.* Sexual abuse is a broad term, which includes a number of acts, including; rape, sexual assault, sex with a minor, and sexual activity with a minor.

#### **ii. Policy:**

At NRSP, such behavior is unacceptable in the workplace, including any interaction or situation that

is linked to official work or official activity outside the office.

NRSP's policies prohibits any behavior on the part of an NRSP employee which constitutes any form of sexual misconduct, including sexual harassment, sexual exploitation, and sexual violence towards any other staff member, client, beneficiary, or other individual participating in a NRSP activity. Retaliation for reports of sexual misconduct is strictly prohibited and will not be tolerated; Sexual misconduct and/or retaliation of any kind will result in termination of employment.

This policy shall apply to NRSP's international staff, national staff, volunteers, interns, consultants, temporary employees, field staff or temporary contractors. NRSP is committed to providing a work environment that is free of discrimination and unlawful harassment. Actions, words, jokes, or comments based on an individual's sex, race ethnicity, age, religion, or any other legally protected characteristics are not acceptable.

### **iii. Reporting Mechanism:**

Any victim/complainant may come forward and report the actual or suspected harassment along with a detailed account including the details of the respondent. The incident can be reported either directly to the Complaint Cell, or through a Safeguarding Officer (SO), who would be the relevant and concerned individual at Regional and District Levels obligated to report and transmit the complaint to the Complaint Cell without any delay.

It is not acceptable for such personnel to delay reporting the complaint to the Complaint Cell on the premise that they were undertaking steps for further verification. Where a particular supervisor, manager or head delays or refuses to forward or inaccurately discloses withholds or provides incomplete information regarding the complaint, it would be treated as a misconduct and shall be subject to severe disciplinary actions including NRSP's right to immediately withdraw, suspend or terminate the contract.

NRSP shall undertake all reasonable and appropriate measures to ensure that the complainant is protected against any adverse acts or retaliation and shall do so by keeping the identity of the complaint anonymous from all other persons except the Complaint Cell, ensuring the complainant's physical and mental wellbeing and removal of the respondent from the complainant's proximity.

### **iv. Investigation of the Complaint:**

Once the complaint regarding harassment has been received by the Complaint Cell, it shall ensure that the Complaint is dealt with in transparent and unbiased manner. There is no time frame for validity of a complaint to the extent of sexual harassment and exploitation.

In doing so, the Complaint Cell shall treat the complaint as a matter of seriousness and of urgency. The initial investigation shall be done in a manner taking into account the legal rules and social norms of Pakistan, ensuring a gender-neutral approach and without the fear or favor of any person or entity.

The Complaint Cell, shall be responsible for the initial screening of the Complaint including making sure that all procedural requirements are met. The Head of the Complaint will then nominate members and constitute a Standing Committee on SE &H.

The Standing Committee shall be tasked with weighing in the merits and necessary evidence to conclude that harassment may have been committed and a case against the respondent is reasonably made out by the Complainant. If the Standing Committee recommends further action, then the Head of the Complaint Cell shall forward the complaint for further action and processing to the Inquiry Committee. It is vital that the Complaint Cell applies a lower objective threshold as it is not tasked

with reaching a decision on the merits of the complaint but only with the admissibility/ non-admissibility of the complaint.

In addition to determining the merits of a complaint alleging harassment, the Complaint Cell shall also be responsible for maintaining data in form of a yearly report on the statistics of complaints received.

**v. Inquiry Committee on SE & H:**

In order to deal with such a sensitive issue, HR, with the consent of the respective Appointing Authority, shall constitute a Committee for SH & E that shall be mandated to further inquire the offence and report its findings and recommendations to the Manager.

The Inquiry Committee on SE & H shall inquire into cases related to "Sexual Harassment" the composition of the committees, will be according to the "Protection against Harassment of Women at Workplace Act 2010" are as follows:-

Such committees are in place at the HQ and all Regional Levels.

Committee consists of three (3) designated members that shall be nominated from a pool of available nominees, these members, of whom two (2) members shall be women. Programme Manager-GAD (As Chairperson), Head-HR (As Member) and one Sector Head (As Member). All of whom shall be trained for safeguarding.

In order to provide help and assistance to the victim of SE and H, there shall be in place a Safeguarding and Welfare Committee, at every Regional Levels. This shall serve a dual role. Any victim can use this Committee to forward its Complaint to the Complaint Cell. This Committee shall also provide counselling assistance to the victims and or any support necessary.

The Appointing Authority can place the concerned employee on leave, under suspension or make an interim arrangement for minimum interaction between the respondent and the complainant or strictly monitor any retaliation during the process of the inquiry.

No salary increases or promotions will be considered unless the inquiry is complete, and the decision announced in writing.

The decision whether respondent has been found guilty or not, reached after the inquiry will be conveyed to the concerned employee in writing and will be filed in the employee's personal file.

Where the allegations of the respondent have not been established, substantiated or have proven to be false, NRSP may reserve the right to refer the matter to the Federal Ombudsperson for Protection against Harassment at Workplace for necessary action.

**vi. Procedures to Be Observed:**

Where an inquiry committee is appointed, the committee will:

- a. Frame a charge-sheet and communicate it to the respondent, together with a statement of allegations explaining the charges and any other related circumstances which are proposed to be taken into consideration.
- b. Require the respondent, within a reasonable time, which will not be less than three (3) working days and not more than ten (10) working days from the day charges have been communicated, to submit a written explanation.

- c. The Inquiry Committee will inquire into the charges and examine such oral or documentary evidence in support of the charges or in defense of the respondent as may be deemed necessary. At the discretion of the Committee, the respondent may be allowed to cross-examine the witness(es), if any.
- d. That Inquiry Committee will hear the matter expediently, with no adjournment except for reasons to be recorded in writing. However, every adjournment, with reasons thereof, shall be reported forthwith to HR.
- e. Where the Inquiry Committee observes that the respondent is hampering or attempting to hamper the process of the inquiry, it will administer a warning and, if thereafter, the respondent is acting in disregard of such warning, it will record a finding to that effect and proceed to complete the inquiry in such a manner as it thinks best suited to achieve substantial justice.
- f. The Inquiry Committee will, within thirty (30) days of initiating such proceedings, submit its findings and the grounds thereof to the Appointing Authority.
- g. During the whole process (starting from verbal warning to inquiry and then termination), if the respondent employee refuses to acknowledge any office order/ notice, HR's representative must read out the contents of the same to the respondent employee in the presence of the Line Manager and another witness. In such cases, notice may also be additionally sent to the Respondent through email (if not already done) and WhatsApp.
- h. In such an eventuality, HR must make notes on the letter explaining that its contents have been read out to the Employee but that the Employee refused to sign the letter of warning. The letter must then be signed by HR and two witnesses, after which the original and a copy of the letter should be filed in the Employee's personal file.

## **2. Child Protection Policy:**

NRSP strictly adheres to and believes in the principle that all children have the right to be protected from any and all sorts of abuse, neglect, exploitation, and violence and that it shall undertake all possible steps to do so.

At NRSP, there is zero-tolerance policy towards child abuse. Any form or action of abuse or exploitation by employees, internees, staff-members, representatives, third-parties, partner organizations, contractors, consultants and/or beneficiaries will not be tolerated.

For the purpose of this Policy and in accordance with the applicable laws in place, **Child** means 'anyone under the age of eighteen (18) years of age'.

**Child Abuse** refers to 'any sort of violence, abuse and/or exploitation against a child'. Its scope extends to include the following actions:

1. Physical abuse: includes where a child is hurt or injured by an adult.
2. Sexual abuse or exploitation; where a child is forced to, used for or subjected to any sexual activity.
3. Emotional abuse; includes emotional maltreatment.
4. Neglect and negligent treatment; ignoring a child's physical and psychological needs and rights.
5. Commercial exploitation; including child labor and modern slavery.

### **i. Safeguarding/ Preventive Mechanism:**

It is important for all staff members and individuals/entities that work at or with NRSP for its various



projects to realize the importance of child rights, to be cognizant of what counts as child abuse/exploitation and how to prevent or report such an incident should the need arise.

Therefore, all staff members, employees, project workers etc., need to have introductory child safeguarding training/briefings. It includes those members and individuals that may not be directly involved with projects where children participation is crucial.

Furthermore, there are safeguarding information should be delivered to adults and children in the communities in which NRSP operates and works, to ensure local knowledge and awareness on child safeguarding. This includes engaging those in local and traditional authorities and should be adapted to suit the context (e.g. billboards, radio or television broadcasts, and distribution of pamphlets/leaflets).

Any projects, works, events or activities that involves participation of children, whether directly or where children are an ancillary part, must include a thorough risk assessment, to eliminate any chances of child exploitation or abuse.

NRSP will monitor and review its work with children, ensuring their input shapes changes that are needed and that this is fed back to them. Questions on safeguarding issues should be included in monitoring and support visits.

#### **ii. Reporting Mechanism:**

Where an individual whether an employee or a staff member etc. reasonably suspects or believes that an incident of child abuse or exploitation has taken place, irrespective by a staff member or third-party involving projects of NRSP, or where a child is in imminent danger, it is obligated upon that concerned individual to immediately report the same to either the Safeguarding Officer on a Regional Level or file a report to the Complaint Cell.

### **3. PROTECTION AGAINST WHISTLE-BLOWING**

Any disclosure or information or exposure made by a whistle-blower regarding NRSP's operation whether related to its inner workings, management and/ or projects is critical. NRSP strives to achieve and maintain the highest standards possible of integrity, transparency, and professionalism, while carrying out its intended objectives and the role played by a whistle-blower is critical in helping NRSP maintain and safeguard its position.

A failure to comply with a legal obligation, miscarriage of justice, a danger to the health and safety of any individual, damage to the environment, or a deliberate concealment of information is occurring, took place in the past or is likely to happen in the future can be brought to notice through this Policy. Hence, this Policy is set out by NRSP as an ultimate resolve to specifically curb such malpractices.

#### **i. Introduction:**

NRSP's whistle blowing policy addresses the commitment of the organization to maintain a zero-tolerance policy towards corruption, corrupt practices, and fraud. The organization encourages and promotes integrity and ethical behavior by helping to foster and maintain an environment where employees can act properly, without fear of revenge or resistance.

Whistle blowing encourages and enables the employees or others to raise serious concerns within the NRSP rather than overlooking a problem or discussing the problems

with outside world.

**ii. Objectives:**

NRSP is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, NRSP expects the employees to come forward and voice those concerns. The policy applies to all employees; (including consultants, interns, or probationers and volunteers). This Policy also covers Board Members.

This Policy governs the reporting and investigation of improper or illegal activities at NRSP as well as protection offered to whistle blowers (reporters). Whistle Blowers are reporters of misconduct, they are not investigators or fact finders, nor are they authorized to determine the appropriate corrective or remedial action that may be warranted.

For the purposes of this Policy a Whistle-blower/ Reporter is ***'an individual or an entity that, in good faith and on reasonable grounds, discloses or attempts to disclose information about corruption or any other wrongdoing committed in or by NRSP or any of its members, staff, employees or related parties'***.

The objectives of this Policy are:

- To develop a culture of openness, accountability, and integrity
- To enable management to be informed at an early stage about acts of misconduct.
- To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith.
- To provide avenues raising concerns in confidence and receive feedback on any action taken.

**iii. Examples of Whistle Blowing:**

1. Conduct, which is an offence or a breach of Pakistani laws.
2. Corruption, fraud, or any other financial embezzlement.
3. Unauthorized or misuse of funds or over-invoicing; false or inaccurate invoices, travel and/ or expense forms;
4. Conduct, which is not in accordance with NRSP's charter and rules;
5. Unauthorized sharing of NRSP or donor data to third parties and persons;
6. Unauthorized use of NRSP's resources for personal gains;
7. Favoritism/ Nepotism for awarding jobs, contracts, or related information;
8. Sexual, physical, or other abuse of employees, clients, or others;
9. Any unethical conduct contrary to NRSP's Charter;
10. Where third party representations are kept secret;
11. A third/ external party not qualified to perform the duties for which it/he/she is engaged;
12. Misrepresentation or failure to cooperate in due diligence process;

13. Absent, vague, inconsistent or false transaction descriptions or account allocations;
14. Absent, false or unusual record of the identity of the payee/ agent/ counter-party;
15. Excessive or unusually high compensation without supporting detail; and
16. Violations of Conflict of Interest policies.

**iv. Principles of Disclosure:**

1. The reporter must disclose the information in good faith.
2. The reporter must believe the disclosed information to be genuinely true.
3. The reporter must disclose on the basis that such is necessary to avoid serious damage and threat to the operations of NRSP.
4. The reporter must not act maliciously or make false allegations.
5. The reporter must not seek any personal gain and or revenge.
6. The reporter will confirm in writing to abide by the confidentiality policy of NRSP.
7. The reporter will not share any information with outside world.

**v. Procedures for whistle-blowing:**

1. As a first step, the concerns should be raised or reported to the Complaint Cell. The Head of the Complaint Cell, upon initial screening of the complaint will start preliminary investigation into the matter. Where, upon completion of the preliminary investigation, it is reasonably established that the complaint does not have merits, the Head of the Complaint Cell shall send an email to the Internal Auditor for his/ her record. The Internal Auditor may then decide whether any further action, in the matter, is required or not. Where, upon completion of the preliminary investigation, it is reasonably established that the complaint has merits, the Head of the Complaint Cell shall forward the complaint to the Internal Auditor for investigation process. It is vital that the Complaint Cell applies a lower objective threshold as it is not tasked with reaching a decision on the merits of the complaint but only with the admissibility/ non-admissibility of the complaint.
2. The Head of the Complaint Cell shall appoint members of the Investigation Committee. These investigating officials will be authorized with access to all sorts of documents that will help them to carry out independent fact finding either through direct and indirect inquiry or/ and detailed investigations. They may or may not require any additional information from the reporter. In case such support is desired, the reporter (whistle blower) will be asked to share the desired information. The reporter shall not be allowed to influence the investigation in any manner whatsoever.
3. Where the concern is against the senior management including the CEO, GMs, Sector and Regional Heads then the same shall be referred to the Audit Committee of the BoD by the Head of Complaint Cell through committee secretary/ Company Secretary. The Executive Committee of the BoD, keeping in view the level and severity of the matter, may constitute a committee for investigation of the matter.
4. In case the reported incident is proven to be wrong with malicious intentions, the investigation team may recommend an administrative action against the reporter

(whistle blower). No action shall be taken against the whistleblower where the reported instance is wrong, but the complaint was based on good faith and without the aim for any personal gain.

5. In case the reported incidence is proven correct, the investigation team shall recommend the matter to the Complaint Cell for disciplinary hearing. In all such cases, the whistle blower will not be given any financial reward.

**vi. Safeguarding Mechanism for the Whistle Blower: -**

NRSP recognizes that the decision to report a corrupt practice, issue or a misconduct can be difficult and confusing and may lead to severe retaliation or in some cases, even revenge. Therefore, to protect the whistle-blower, NRSP in accordance with its Human Resource Policies will not tolerate harassment, retaliation or discrimination against a whistle-blower/reporter and shall undertake all reasonable and practical steps to protect those who raise an issue in good faith.

For the purpose of this Policy, '**Retaliation**' means 'action done to an individual with the intention of causing harm to a reporter/whistle-blower for reporting in good faith alleged unsatisfactory conduct and/or misconduct'.

Complaints of retaliation must be made to the Head of the Complaint Cell as soon as possible and no later than fifteen (15) working days after the latest alleged act of retaliation has taken place. Individuals who believe that retaliatory action has been taken or may be taken against them reporting or disclosing inappropriate behavior should submit the complaint including any supporting information and documentation available to them, regarding the retaliation or adverse action taken against them.

No member, officer or employee of NRSP shall take any coercive or adverse action or other retaliatory action against a whistle-blower who exercises his or her rights under this Policy and Procedure. Any member, officer or an employee who takes any retaliatory action against a person who, in good faith, makes such a report will be subject to disciplinary action.

The Company, its Board of Directors, Audit Committee or management shall ensure that no whistle-blower, if he/ she is an employee/ former employee, is subject to any adverse action, including but not limited to-

- any disciplinary action;
- dismissal, suspension, harassment or intimidation;
- transfer against his or her will;
- refusal of transfer or promotion;
- withholding or suspension of his salary and/or benefit payments;
- being threatened, either directly or indirectly through family members, with any of the actions referred above, or be otherwise adversely affecting in respect of his or her employment, profession, or office, including employment opportunities and work security.

Nevertheless, if retaliation against an individual is established, the Board shall, after

considering any recommendations made by the Complaint Cell take appropriate measures aimed at correcting negative consequences suffered as a result of the retaliatory action.

Such corrective measures will be decided on a case-by-case basis and may include, but are not limited to, the rescission of the retaliatory decision, including reinstatement or, if requested by the complainant, transfer to another office or function for which the individual is qualified and where the complainant can work independently of the person(s) who engaged in retaliation.

All concerns will be treated in the strictest confidence and every effort will be made not to reveal the identity of whistle blower. At the appropriate time, however, whistle blower may be required to come forward as a witness. The whistle-blower may opt to keep his identity confidential. The Complaint Cell shall give an option to the whistle-blower to disclose himself/herself. The whistle-blower shall further be informed that in such sensitive cases of misconduct, the Company may not be able to further proceed further and initiate disciplinary actions, where the whistle blower's testimony is key in establishing the alleged misconduct.

However, this policy do not provide amnesty/ protection to whistle blowers nor preclude the Commission from bringing an action against such whistle blower for his conduct in connection with violations of the applicable laws, if any.

#### **vii. Record Maintenance:**

The management of the Complaint Cell shall maintain a file of copies of the memoranda and written communications received reporting a complaint, as well as a written summary report of the investigation results and any action taken or proposed to be taken. The memorandum, communications, and summary report shall be retained till a period of ten (10) years.

Based on the available data of the complaint memo, NRSP with the assistance of the Complaint Cell shall on a quarterly or yearly basis, publish a report detailing the progress and implementation of this Policy including the statistical data of the complaints recovered and resolved. This data shall be publically available on the NRSP's website for general viewing.

#### **4. Anti-Fraud & Corruption Policy:**

NRSP is committed to the promising standards of honesty, transparency and accountability in all its dealings. NRSP demands to promote a culture of honesty and resistance to fraud in all its forms. It further recognizes that the prevention and mitigation of fraud and corruption in its activities and operations are essential to the mandate NRSP holds.

The purpose of this policy is to provide a clear summary to staff of their responsibilities for identifying exposures to fraudulent activities and for establishing controls and procedures for preventing such fraudulent activity and/ or detecting such fraudulent activity when it occurs.

NRSP shall ensure to undertake all necessary arrangements so that the proceeds of any funds or financing are used only solely for the purposes for which the funds were donated for. NRSP is committed to promoting and adhering to the highest standards of probity and accountability in the use of its financing and will not tolerate the diversion or waste of the resources through fraud or corruption.

For the purposes of this Policy, NRSP defines

**Fraud as:**

"The misappropriation, theft, embezzlement or misuse of NRSP's funds or other resources having monetary value of 100,000 rupees or more, by an employee or a third party, which may or may not also involve misstatement of financial documents or records to conceal the misappropriation, theft, embezzlement or misuse."

**And Corruption as:**

"The offering, giving, receiving, or soliciting, directly or indirectly, of anything of value, by an employee or a third party in order to improperly influence the actions of NRSP;"

Corruption can include nepotism or favoritism. It can also include certain violations of Conflict-of-Interest policies. As NRSP has a zero-tolerance policy, fraud and corruption are not merely restricted to monetary or material gain (of any size) but include any intangible benefits such as status or information, promising, giving, accepting, or soliciting money, a gift or other private advantage as an inducement to, or reward for doing something that is illegal, an abuse of power or authority, a breach of trust or duty.

The following examples of may raise suspicion and be helpful indicators of fraud and corruption risk:

- i. *Misrepresentation with regards to educational qualification while acquiring job;*
- ii. *Provision of bogus educational certificates and or experience certificates with regards to previous employment history;*
- iii. *Production of fake medical bills and medical certificates;*
- iv. *Obtaining bribe from intended beneficiary to pass on donor or NRSP funded cash or in kind grant;*
- v. *Accepting cash, gifts or other benefits from third parties or beneficiaries in exchange for providing details for their dealings with NRSP;*
- vi. *Unauthorized removal and addition or replacement of beneficiaries in project area;*
- vii. *Destruction or removal of records.;*
- viii. *Blackmail or threats;*
- ix. *Theft of funds or any other NRSP property;*
- x. *Paying of excessive prices or fees to third parties with the aim of personal gain;*
- xi. *Providing microfinance loans to single individual through processing of multiple loan cases in name of different individuals, or allowing loan sharing by clients among them;*
- xii. *Preparing and processing of such credit cases (or providing assistance in preparation thereof) for which there is no application from any client or using the CNIC and other information of any person without his/ her knowledge and consent, (even with or without the consent of supervisory structures);*
- xiii. *Providing wrong information to supervisors with regards to loan utilization;*
- xiv. *Collecting recoveries from borrowers and not depositing them in NRSP designated bank accounts or with concerned staff authorized to collect recoveries; and*

xv. *Unauthorized retention of official cash.*

Fraud and corruption in all its forms are immoral, and is unacceptable at NRSP. This is because where such occurs:

*i. It is not just a loss to NRSP, but eventually to beneficiaries and communities living in the state of abject poverty and are the most needy for the assistance of NRSP*

*ii. It may have a major impact on reputation of NRSP and on donor confidence*

NRSP's objective is that fraud and corruption are eliminated from its activities.

### **i. Responsibilities of Employees:**

#### **Senior Management Team**

It is the responsibility of managers to be familiar with the types of fraud and corruption that might occur in their area, be alert for any indication of fraud or improper activity and maintain controls to avoid such occurrences. Managers are required to ensure that all staff under their control be given a copy of this policy in a language they can understand and acknowledge its receipt. Managers should also ensure that staff be encouraged to report suspected issues of fraud.

#### **All Staff**

It is the responsibility of all employees to carry out their work in such a way as to prevent fraud happening in the workplace. Employees must also be alert for occurrences of fraud, be aware that unusual transactions or behaviors could be indications of fraud and report potential cases of fraud as outlined below.

#### **Mandatory Reporting/ Complaining Mechanisms:**

Employees are required to immediately report issues of suspected fraud and corruption. Employees should report their suspicions as follows:

#### **Employees who suspect fraud should not do any of the following:**

**X** Contact the suspected individual(s) directly in an effort to determine facts, demand explanations or restitution; and

**X** Discuss the issue with anyone within NRSP other than the Complaint Cell.

### **ii. Investigation:**

Upon receiving the complaint regarding the alleged fraud or corruption, the complaint will be screened to ensure that it meets the standard criteria necessary for a valid complaint, including but not limited to the details of the complainant.

Once, the initial screening is completed, the Head of the Complaint Cell will undertake a preliminary investigation to determine the merits of the complaint considering any and all evidence provided with the complaint.

Where, upon completion of the preliminary investigation, it is reasonably established that the complaint does not have merits, the Head of the Complaint Cell shall send an email to the Internal

Auditor for his/ her record. The Internal Auditor may then decide whether any further action, on the matter, is required or not.

If it has been determined there is a substantial cause for proceeding with the complaint and the issue at hand is likely to severely prejudice NRSP or its working and projects, the matter will be forwarded to the Investigation stage.

Investigation should be done either by appropriately experienced independent NRSP staff, or by independent third parties. An investigation is required to be done without regard to any person's relationship with NRSP, position or length of service. Where appropriate, the Complaint Cell may request oversight of the Internal Auditor. The safeguards for reporting employees must be applied in all cases.

Where, the complaint regarding a misconduct is against any of the Senior Management i.e., the Executive Committee and the Complaint Cell, then the matter will go to the Audit Committee through the Internal Auditor.

All work of the investigation team will be documented, including transcripts of interviews conducted. The conclusion of all fraud investigations must be documented.

The person(s) that initially reported the suspicions should be informed of the outcome of the investigation but this should be done only once the report and proposed course of action has been finalized.

### **iii. Safeguards for Employees:**

Issues reported to line management and the helpline will be investigated with the following safeguards. Safeguarding mechanism are detailed in the 'Whistle-Blowing Policy'.

### **iv. Confidentiality:**

NRSP will endeavor to protect an individual's identity when he or she raises an issue and does not want their name to be disclosed. It should be understood, however, that an investigation of any malpractice may need to identify the source of the information and a statement by the individual may be required as part of the evidence.

### **v. Legal Protection:**

NRSP will bear the legal fee for the defense of investigation officers, officials and employees providing meaningful support for implementation of anti-fraud policies and procedures.

Auditor may then decide whether any further action, in the matter, is required or not.

### **vi. Untrue Allegations:**

If an allegation is made in good faith, but it is not confirmed by an investigation, NRSP guarantees that no action will be taken against the complainant. If, however, individuals make malicious false allegations, disciplinary action shall be considered against an individual making the allegation.

### **vii. Actions Arising from Fraud/ Corruption Investigations Disciplinary procedures:**

Where appropriate, NRSP may refer significant fraud to the local law enforcement agencies with a view to initiating criminal prosecution. In every case, the final decision whether or not to prosecute



should be taken by the CEO on the recommendation of concerned supervisor/ sector head. The Board has already empowered the CEO through a Special Power of Attorney to file civil and criminal cases.

**viii. Recovery of losses:**

Where NRSP has suffered loss, full reimbursement will be sought of any benefit or advantage obtained and the recovery of costs will be sought from individual(s) or organization(s) responsible for the loss. If the individual(s) or organization(s) cannot or will not make good the loss, consideration will be given to initiating civil and/ or criminal legal action to recover losses.

Therefore, in order to minimize or offset the chances of any such losses, NRSP may incorporate a right of lien in the employment contracts including expanding the scope to Gratuity, unpaid leaves and/or Provident Fund.

**ix. Record Maintenance:**

The complaints related to fraud and corruption are likely to highlight where there has been a failure of supervision and/ or a breakdown or absence of control. Thus, NRSP with the assistance of the Complaint Cell shall maintain thoroughly a register of complaints inform of a summary and the results and action therein taken.

The record is maintained in a logbook containing the name of complainant, CNIC, contact details of the complainant, brief nature of complaint, concerned official to whom the complaint is marked.

This course of action required to improve systems will be documented in the investigation report and implemented when this report is finalized.

## **5. Conflict of Interest:**

It is the duty of every NRSP employee and staff members to both avoid and report a potential Conflict of Interest. Any incident of a potential Conflict of Interest would severely undermine the integrity of NRSP and its operations. NRSP strives to avoid Conflict of Interest as well as the appearance of impropriety to ensure that it continues to operate in accordance the guiding principles of good corporate governance.

This policy describes concerned individuals who may be involved in actual or potential conflicts of interest and imposes a continuing duty of disclosure.

**i. Definitions:**

For the purpose of this Policy;

**Conflict of Interest** means 'when personal interests of an employee, staff member, or those of a third party, as a result of its position and relationship, interferes, contradicts- or appear to interfere and contradicts - with the interests of NRSP.

**Close relationships** means 'real father, real son, son-in-law, father-in-law, brother-in-law, real grandchild, real grandparent, real mother, real daughter, daughter-in-law, mother-in-law, sister-in-law, real brother, real sister, wife, husband, first cousin (maternal and paternal).

A Conflict of Interest may arise in a situation where the employee uses its position within NRSP for personal, financial or material gain. A potential Conflict may also arise when the employee's

performance can be influenced by conflicting loyalties.

## **ii. Duty of Full Disclosure:**

It is extremely important that all NRSP employees, staff members, third parties and personnel disclose any situation that may involve a Conflict of Interest as soon as it arises. The purpose of disclosure is to allow for adequate consideration and, if necessary, action to mitigate or eliminate the conflict, so we avoid any negative impact.

It shall be the continuing responsibility of all employees, members and concerned parties having business term with NRSP to review their outside business interests, personal interests, family, and other close relationships for actual or potential conflicts of interest with respect to NRSP and to immediately disclose the nature of the interest or relationship.

In addition to the above, the Board has devised a Policy wherein the children of staff members or employees may take up positions and employment at NRSP. In such a case, the concerned employee or staff member is bound to disclose the Conflict of Interest. It would then be the decision of NRSP to consider the prospective candidate for employment based on his/her competence and whether such would not prejudice NRSP's good governance mechanism.

## **iii. Reporting:**

The Disclosure shall be made to the immediate Supervisor or Manager immediately upon realization of a potential Conflict of Interest. A failure to disclose a potential Conflict of Interest may lead to disciplinary action including termination.

Where an employee believes that there has been a failure to report a potential interested party, he/she can lodge a Complaint to the Complaint Cell.

## **6. Discrimination:**

### **I. Introduction:**

Discrimination is often used on a day to day basis to describe being treated unfairly for a particular reason. However, at NRSP, both discrimination and specifically gender based discrimination are prohibited. There is no place for such gender stereotypes. Especially norms that dictate what is appropriate for women and men, in our society. Thus, resultantly such stereotypes generally influence the status and opportunities available to women in our society.

The nature of work undertaken at NRSP requires active participation of women alongside that of men and boys. Such is vital for the end result which is the benefit to communities as a whole, something that NRSP has been striving for so long. Gender equality is thus a pivotal pillar in the overall functions and responsibilities at NRSP.

Therefore, any form of gender-based discrimination against anyone especially females is absolutely prohibited, as there is lots that can be done to help build a more gender-equal work environment.

### **II. Definitions:**

Discrimination at NRSP is defined as '*the situation where NRSP employees, staff-members, beneficiaries and related third-parties are treated differently and unfairly*

*simply because they are male or female, belong to a different religion or ethnicity, have a disability, face a social or language barrier’.*

Gender-based discrimination at NRSP refers to *‘situations in which staff-members, employees and beneficiaries are treated differently simply because they are male or female, rather than on the basis of their individual skills or capabilities.*

Discrimination may take many forms. It may be direct or indirect, by way of exclusion, harassment or victimization. All such forms of systematic discrimination are not tolerated at NRSP.

**Direct Discrimination:**

Direct discrimination occurs when a complainant or a victim is treated less favorably because of a characteristic they possess or are perceived as having. This usually is a deliberate act, however, it can be unintentional as well.

**Indirect Discrimination:**

Indirect discrimination is normally unintended. It occurs where a rule, policy or a plan applies generally to everyone but indirectly puts people with certain characteristics at a visible disadvantage.

**Victimization:**

This is similar to retaliation. It occurs when a complainant or victim suffers a detriment because they may have or are suspected to have made an allegation or complaint against an alleged discrimination. This can cause serious loss to the complaint including being disadvantaged or harmed.

### **III. Reporting Mechanism:**

Any victim of such discrimination especially in case of a women is strongly encouraged to come forward and report such incident. Where the victim feels that he or she is not in a position to directly report the incident, a colleague, immediate supervisor or a friend can report the incident on the complainant’s/victim’s behalf.

The reporting of such incident should done through lodging a complaint to the Complaint Cell for further necessary action.

### **IV. Safeguarding Mechanism:**

In order to encourage equality at workplace and discourage such discrimination especially against women, there are safeguarding mechanism in place including against retaliation and violence. This is to ensure that no complainant or victim remains unheard as such would be a detriment for NRSP itself.

**VIII. Exclusions:**

The GRS does not apply to record and act on complaints related to associated companies or subsidiary companies of NRSP insofar they do not relate to the operations of NRSP in any manner or form. These companies have developed their own mechanism for redressal of such complaints/ grievances, as these are completely separate entities having own legal identities and their own independent Board of Directors. The complainants are only directed to respective associate or subsidiary by providing the contact details of respective institution.

- I. The GRS does not log complaints for the matters pending in court of law or have been registered with other regulatory bodies by the complainants unless they are compelling reasons to do so provided there is no legal bar and it will not prejudice pending legal proceedings, if any.
  - II. Complaints previously closed are not reopened unless fresh or relevant evidence is provided for re-opening of the complaints.
-