

NRSP

*Whistle
Blower
Policy*

3.15. WHISTLE-BLOWING POLICY

Disclosure of information made by an employee to NRSP's top-management or Board of Directors, where the employee reasonably believes that a criminal offense, 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.

Policy

In order to promote transparency, underpin the risk management system and help protect the reputation of the organization. NRSP's whistle blowing policy addresses the commitment of the organization to the integrity and ethical behavior by helping to foster and maintain an environment where employees can act properly, without fear of revenge.

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. 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 & volunteers). The policy also covers Board Members.

Objective of the Policy

The objective of this policy is:

- 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.

Scope

The 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 they are authorized to determine the appropriate corrective or remedial action that may be warranted.

Examples of Whistle Blowing Acts

1. Conduct, which is an offence or a breach of Pakistani laws.
2. Conduct, which is not part of NRSP's charter
3. Unauthorized sharing of NRSP or donor data to third parties and persons.
4. Un authorized use of NRSP's resources for personal gains

5. Favoritism /Nepotism for awarding jobs, contracts or related information
6. Sexual, physical or other abuse of employees, clients or others.
7. Other unethical conduct.

General Guidance and Safeguards for the Whistle Blower:-¹

NRSP recognizes that the decision to report an issue/misconduct can be a difficult and confusing. Therefore the reporter (the whistle blower) have to be sure that act to be reported should be genuine and on good faith.

NRSP in accordance with its Human Resource Policies will not tolerate harassment or discrimination and will take all practical steps to protect those who raise an issue in good faith.

No Member, officer or employee of NRSP shall take any adverse Personnel Action or other retaliatory action against a Whistleblower who exercises his or her rights under this Policy and Procedure. Any Whistleblower who believes that he or she has been retaliated against for reporting or disclosing Inappropriate Behavior should file a written complaint in accordance with existing HR- policies and procedures.

The company, its board of directors, Audit Committee or management shall ensure that no whistleblower, 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;
- threatening, either directly or indirectly, 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.

All concerns will be treated in confidence and every effort will be made not to reveal identity of whistle blower. At the appropriate time, however, whistle blower will be required to come forward as a witness.

However, The Regulations do not provide amnesty/protection to whistleblowers nor preclude the Commission from bringing an action against such whistleblower for his conduct in connection with violations of the applicable laws, if any.

Principles

1. The reporter must disclose the information in good faith.
2. The reporter must believe the disclosed information to be substantially true.
3. The reporter must not act maliciously or make false allegations.
4. The reporter must not seek any personal gain.

¹ Elaboration of whistle blower/ reporter's protection procedures

Procedures

- a. As a first step, the concerns should be raised with immediate supervisor/manager or regional / district head in verbal or written form.
- b. In case if the concern is against the supervisor the same shall be reported to HR-Section at HO Islamabad. The department will issue acknowledgement of receipts of all concerns shared in written form within 5 working days of receipt of such concerns to the reporter.
- c. The HR-Section will forward the reported concern to authorized officials for investigation.
- d. In case if the concern is against the senior management, then the same shall be referred to the executive committee of the BOD by the HR-Section through committee secretary/Company Secretary
- e. The authority to whom the concern/complaint reported, keeping in view the level and severity of the matter, may constitute a committee for investigation of the matter.
- f. The investigating officials will be authorized with access to all sort 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 support of the reporter. In case if such support is desired, the reporter (whistle blower) will share the desired information, in all other cases the reporter will not try to influence the inquiry and investigation.
- g. In case, if the reported incident is proven to be wrong with malicious intentions , the investigation team may recommend an administrative action against the reporter(whistle blower) where no action be taken against whistle blower if the reported instance is wrong and based on good faith without having an element of personal gain.
- h. In case if the reported incidence is proven to correct, the investigation team may recommend for another investigation (if it is not already provided in their scope of work to investigate and assess the potential or given loss). In all such cases, the whistle blower will not be rewarded with any financial reward.