

Whistleblowing Policy

Dubai Islamic Bank Pakistan Limited

This Policy supersedes any previously issued policy on “Whistleblowing”



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Dubai Islamic Bank

TABLE OF CONTENT

1.	OVERVIEW	2
2.	SCOPE.....	2
3.	OBJECTIVE	3
4.	APPLICABILITY.....	3
5.	WHISTLE BLOWING COMMITTEE	4
6.	REPORTING & PROCESS.....	5
7.	ANONYMOUS REPORTS, MISUSE OF POLICY & NO IMMUNITY	5
8.	POST-DISCLOSURE ISSUES	6
9.	UPDATION & REVISION OF POLICY	6
10.	MONITORING & AWARENESS.....	7
11.	REWARD FOR WHISTLEBLOWING/ACTION AGAINST FALSE COMPLAINTS.	7
12.	CONFIDENTIALITY & PROTECTION OF THE WHISTLE BLOWER.....	7
13.	RECORD KEEPING & MIS.....	7

1. Overview

- 1.1 It is Dubai Islamic Bank's Pakistan Limited (DIBPL) endeavour to have a corporate governance framework based on independence and transparency. Whistleblowing mechanism is an important component of the same.
- 1.2 Whistleblowing occurs, when any person or external party such as shareholder, vendor, customer etc. provides information or raises a concern about any criminal or unethical conduct evidenced by him/her. The whistleblower is usually not directly, personally affected by the criminal or unethical conduct.
- 1.3 Employees have an important role in upholding DIBPL core values and business principles. They can be the first to realize wrongdoing in the workplace, but may feel that they cannot express their concerns because:
 - a) it might be disloyal to their colleagues; and/ or
 - b) it might be disloyal to the organization; and/or
 - c) they are concerned that they may be personally victimized as a result of making a disclosure under this policy
- 1.4 This policy is designed to ensure that DIBPL employees, customers and external parties can report a case of (suspected) criminal or unethical conduct while those employees who blow the whistle in good faith will not be regarded as disloyal or suffer such detriment (even if their suspicion ultimately proven unfounded).
- 1.5 This approach of DIBPL will result in;
 - a) Creating an internal climate in which employees can raise genuine concerns without fear of suffering detriment or reprisal, and
 - b) Increasing the likelihood of alerting management to problems so that they can be addressed to prevent further damage; and
 - c) Deterring people from engaging in criminal or unethical conduct by promoting the atmosphere of openness, transparency and integrity.
- 1.6 DIBPL is committed to ensuring that every report made under this policy is investigated thoroughly, on a timely basis, and with appropriate technical and investigative expertise, and that the investigation is fair to all parties involved.

2. Scope.

This policy applies to:

- All employees of Dubai Islamic Bank Pakistan Limited (DIBPL) and
- Outsourced staff working under the direct or indirect supervision of staff formally employed by the DIBPL.
- Outside parties such as shareholders, vendors, customers etc.

3. Objective

3.1 This document outlines the DIBPL Policy on 'Whistleblowing' and applies to the internal and external reporting of (suspected) criminal or unethical conduct.

3.2 The objectives of this policy are:

- a) to encourage employees & external parties to report (suspected) criminal or unethical conduct in good faith, whether or not they have a legal obligation to make such reports and to ensure that employees who make such reports are protected from detriment or harm arising from their action;
- b) to provide guidance on types of criminal or unethical conduct;
- c) to provide guidance for dealing with (suspected) criminal or unethical conduct in a constructive and effective way;
- d) to ensure that all reported cases are handled fairly, promptly and are appropriately investigated;
- e) use all its appropriate resources to address criminal or unethical conduct if it has occurred or is occurring; and
- f) discipline any individual who treats in a detrimental way any other individual who makes such a report.

3.3 This policy is primarily for concerns when the interests of external parties, other employees or the organization itself are at risk. If in doubt- raise it.

4. Applicability

4.1 It is practically impossible to give an exhaustive list of the activities that constitute misconduct. However, we would expect employees to report the, **Criminal / unethical Conduct** including but not limited to the following;

- a) Dishonest, fraudulent, improper, illegal, or negligent professional activity or behaviour; and
- b) Failure to act diligently when carrying out duties

4.2 Certain types of criminal or unethical conduct, generally financial crime and other criminal offences can cause a legal obligation on the part of the employee, and therefore on DIBPL itself, to make a report.

4.3 The nature of the criminal or unethical conduct and whether or not there are legal obligations, makes no difference to the protections offered to the employee making the report.

4.4 Criminal or unethical conduct, for purpose of this policy includes (and not limited to):

- a) Breaches of law or regulation;
- b) Violations of DIBPL's Core Values, Business Principles and Code of Conduct;
- c) Serious/ repetitive/ intentional breaches of DIBPL's internal rules & regulations;
- d) Questionable accounting and auditing matters;
- e) Any deliberate concealment of criminal or unethical conduct;
- f) Breach of customer confidentiality (also refer to DIBPL's Code of Conduct);
- g) Harassment, bullying or other forms of unfair discrimination on the basis of gender, age, religion or nationality in workplace (also refer to DIBPL's Code of Conduct);
- h) Endangerment of the health or safety of any person; and
- i) Any other conduct which may cause financial or reputational loss to the company or be otherwise detrimental to the interest of the company.

4.5 Examples of criminal or unethical conduct which are likely (subject to jurisdiction) to oblige the employee to make a report include the following:

- a) Market Abuse
- b) Money laundering and Terrorist financing
- c) Insider trading
- d) Theft
- e) Fraud
- f) Bribery or Corruption
- g) Serious irregularities in (financial) reporting

4.6 In case of conflict between this Employee Whistleblowing Policy and any laws or regulations including professional obligation, the laws and regulations must be followed rather than this policy.

4.7 This policy is not designed to cover personal grievances of employees related to employment.

5. Whistle Blowing Committee

5.1 To ensure independence and transparency of the whistle blowing program, a Whistle Blowing Committee (WBC) would be constituted under the supervision of Board Audit Committee (BAC) comprising of following members.

- a) Head of Internal Audit (Chairman),
- b) Head of Compliance
- c) Head of Human Resource
- d) Head Employee Relations (Secretary)

5.2 The Committee shall meet on quarterly basis or as & when required. The minimum quorum required for the meeting is three members, however, approvals may be obtained from the members through email in case of urgent decision matters.

5.3 Secretary of the Committee will provide the secretarial services to the Committee and share the quarterly status on all whistle blow cases with the Chairman of the

WBC for onward submission to BAC.

6. Reporting & Process

6.1 Any concern relating to Whistleblowing can be reported/ escalated as follows:

- a) Direct Supervisor
- b) Head of Internal Audit,
- c) Head of Compliance
- d) Head of Human Resource

6.2 For the purpose of reporting, it is recommended to use the dedicated Email ID: DIBPAK -Whistle Blowing group (allusersWBdibpak@dibpak.com)

6.3 Employees should ensure that the reporting is done in writing by using the attached forms at Annexure-B. Verbal reports will not be entertained.

6.4 External parties can register their concern through bank's website.

6.5 Once a concern has been reported, appropriate action will be taken by WBC to ensure an independent and fair investigation of the matter.

6.6 The fact of the disclosure and the (suspected) criminal or unethical conduct will be treated with the utmost confidentiality by all parties involved or otherwise aware of the reported matters (subject always and only to any disclosures required to be made as part of any regulatory process and/or legal proceedings).

6.7 Where an employee who is Direct Supervisor receives a disclosure made under this policy, he or she should immediately engage Whistle Blowing Committee for further guidance.

6.8 Where there are criminal concerns or unethical conduct relating to unacceptable treatment of employees, such concerns will usually then be passed to, and investigated by, the appropriate Human Resource function and similarly, WBC will also engage relevant stakeholders when required for the investigations due to their expertise.

7. Anonymous Reports, Misuse of Policy & No Immunity

7.1 Employees are strongly encouraged not to report concerns anonymously as:

- a) DIBPL is absolutely committed to protecting employees who make reports under this policy, and so there should be no reason to report anonymously; and
- b) The subsequent investigation may be hindered if contact cannot be made with the individual raising the concern to obtain clarity or further information; and
- c) DIBPL is obliged and committed to respect the rights of its employees, which

include the right for an accused person in due course to know the identity of his or her accuser. The identity would, however, not be disclosed unless it is absolutely necessary for the purposes of the investigation and/or subsequent action, and never disclosed without prior discussion with the employee making the report.

7.2 Any employee who is found to have used this policy to file malicious or frivolous reports will themselves risk disciplinary action.

7.3 No employee making a report whose own conduct is implicated in the matters reported under this policy will be given any immunity from personal investigation or discipline purely as a result of having made the report. Consideration will however be given to the fact that a report has been filed and to all assistance and co-operation provided by the relevant employee.

8. Post-Disclosure Issues

8.1 DIBPL will endeavour to keep whistleblowers informed as to how their concerns are being addressed. However, for legal or practical reasons this will not always be possible: as examples;

- a) Disciplinary action against an individual, or
- b) An investigation by a regulator or law enforcement agency

8.2 Employees who raise concerns or report potential criminal or unethical conduct must keep it confidential, the fact that they have done so, the details of the matter and any feedback given to them and not make disclosures other than in accordance with this policy. Employees should also understand that all matters reported under this policy will, where required, and where they are found to be true and are considered to be material, either be notified to, or otherwise remain available for inspection by, the relevant regulatory authorities, if required.

8.3 All material matters reported, and the status of the subsequent investigation, will in turn be reported to the CEO & the Board Audit Committee in order to discharge their respective responsibilities on quarterly basis.

8.4 Where a disclosure has been made in good faith, and subsequently leads to regulatory or court hearings, the employee initiating the report may be obliged to act as a witness. Where this occurs, DIBPL will provide appropriate help and support, including any necessary legal advice, to the employee up to and throughout the hearing.

9. Updation & Revision of Policy

9.1 This Policy is effective as of date of approval from the Board of Directors (BoD) and would be reviewed after 3 years or as and when considered necessary by WBC.

10. Monitoring & Awareness

- 10.1 WBC will monitor and review this policy regularly to assess its effectiveness. Communications regarding the policy will be disseminated by Secretary of the WBC through emails, flyers and awareness sessions etc. from time to time.
- 10.2 For external parties, Whistle blow secretary will place guidelines on “How to make whistle blow complaint” on DIBPL’s website for outside parties such as vendors, customers & shareholders’ awareness.

11. Reward for Whistleblowing/Action against False Complaints

- 11.1 Besides provision of protection to the whistle blower, CEO / BAC may decide, at the recommendation of WBC, to reward the whistle blower. However, whistle blowing does not create a right to reward rather it is the Duty of the whistle blower in the larger interest of the organization and /or its Stakeholders.
- 11.2 However, to ensure healthy working environment, reporting of biased and / or unfounded allegations to victimize any person and/or the bank will be treated as an Offence and the bank reserves its right to take any suitable action against such whistle blowers.

12. Confidentiality & Protection of the Whistle Blower

- 12.1 The whistle blowing reporting mechanism has been designed to ensure complete confidentiality of the entire process and also enables the bank to take immediate corrective measures.
- 12.2 Identification of the whistleblower is kept completely confidential except as required by law or who have legitimated right to know.
- 12.3 The bank stands committed to protect whistleblowers for whistle blowing and any subsequent harassment or victimization of the whistleblower is not tolerated.

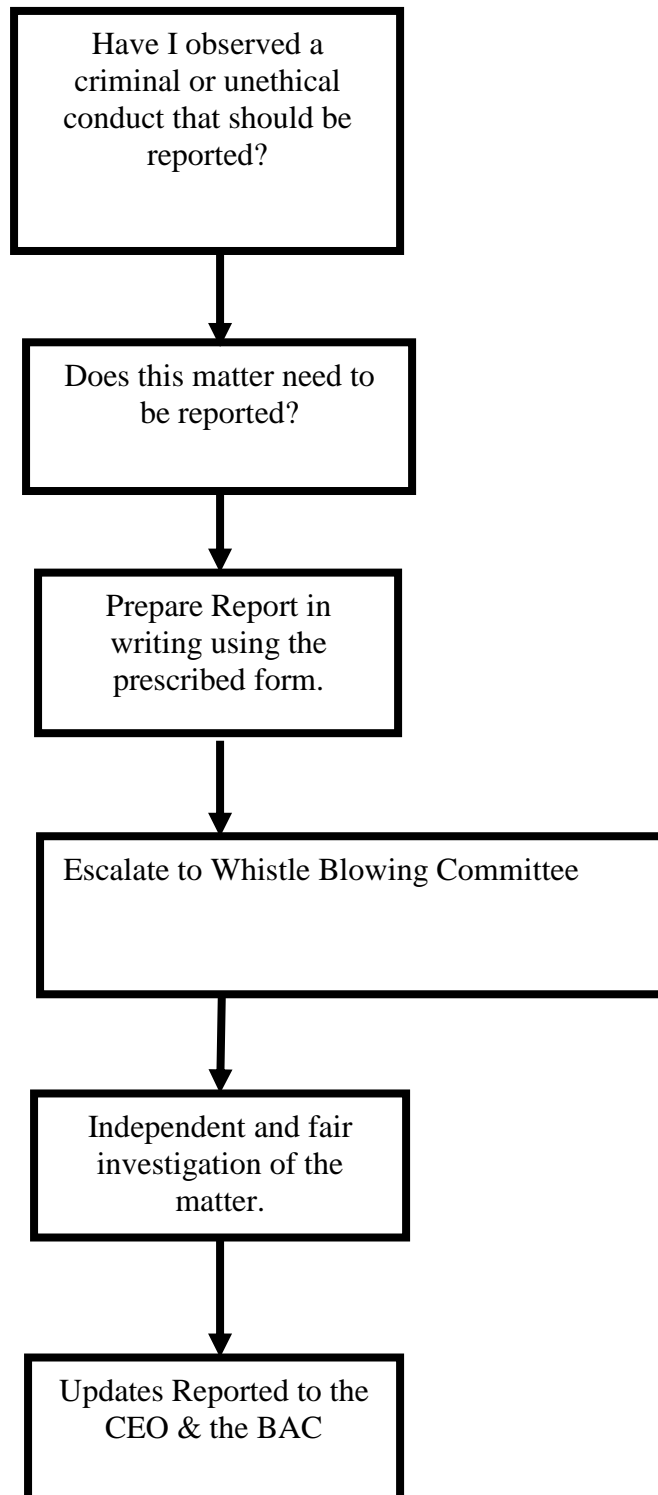
13. Record Keeping & MIS

WBC Secretary will maintain the record of all the concerns raised and present a quarterly report to WBC. The report will not mention the names of employees raised the concern, only the concerns raised, the number of such concerns, what department they related to, the post against which the concerns were related to and undertaken actions to prevent recurring of the same cases in the Bank/the Department in which the concern was raised.

ANNEXURES

Annexure-A

Whistle Blowing Policy – Process Flow



Annexure-B

Employee Whistleblowing Report

Name of Whistleblower:

Address:

Phone Number

Employee Number (For Employees only):

Department: (For Employees only)

Suspected Reason for Reporting:

- ☐ Breach of law or regulation
- ☐ Violation of DIBPL's Core Values and Business Principles or other unethical conduct & Code of Conduct
- ☐ Breach of DIBPL's internal rules and regulations,
- ☐ Accounting and auditing matters
- ☐ Criminal or unethical conduct
- ☐ Breach of client confidentiality
- ☐ Sexual Harassment, bullying or other forms of unfair discrimination in the workplace
- ☐ Endangerment of the health or safety of any person
- ☐ Any other conduct which may cause financial or reputational loss to the company or be otherwise detrimental to the interest of the company
- ☐ Market Abuse
- ☐ Parallel Banking
- ☐ Money laundering
- ☐ Terrorist financing
- ☐ Insider trading
- ☐ Theft
- ☐ Fraud
- ☐ Bribery & Corruption
- ☐ Serious irregularities in (financial) reporting.

Others (please specify):



Detail of the Report: (Including what, when, where & how you became aware):

Who are in your opinion, the persons involved?

Name: _____

Department: _____

Direct supervisor: _____

Do you have any evidence which can be handed over?

☐ Yes (If Yes, please enclose with the report) ☐ No

☐ **I have read the Employee whistleblowing policy and agree to be bound thereto (For Employees Only)**

Signature:**Date:**

For Internal Use ONLY**Received by:**

Name:

Department:

Designation:

Signature:**Date:**