

WHISTLE BLOWER POLICY

A. General

- a. The SMS whistleblower policy recognizes that any person working on its behalf has a right to expose any kind of information or activity that is deemed illegal, unethical, not consistent with organizational policies and voluntary commitments, safety and security concerns, or other activities related to security operations that may result in an undesirable event. The whistleblower policy is intended to encourage and enable employees and others to raise serious concerns internally so that SMS can address and correct inappropriate conduct and actions. SMS pledges not to retaliate by taking "adverse action" against workers who submit non-frivolous complaints.
- b. Such a person can resort to raising 'the issue' through formal channels or anonymously. In either case he is entitled to protection under the **Whistleblowers Protection Act 2015**.

B. Policy

- a. Any person working on behalf of SMS, who in good faith reports suspected inappropriate behavior, illegal practices, violations of human rights, or dishonest use or misuse of its resources or property or complaints concerning SMS' security operations shall not suffer harassment, retaliation, or adverse employment or other consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.
- b. Whistle-blowers will not only be protected, they will be rewarded with a cash award of Rs 1000/- or more, if the issue that has been highlighted is of value to the Company.
- c. Whistleblower reports received will be treated confidentially or anonymously, as applicable, to the extent that is reasonable and practicable under the circumstances.
- d. Whistle-blowers will be informed of the outcome of the investigation and any actions taken on their complaints consistent with any privacy or confidentiality limitations.

C. **Whistle-blowing Tools/ Means.** SMS has an open door policy and encourages the employees to share their questions, concerns, suggestions or complaints with their supervisor. Persons not comfortable speaking with their supervisor or a supervisor's response is not satisfactory, then the concern should be raised to the next level of the chain of command, by using the following mechanisms:

- a. **Town Hall Meetings.** A Town Hall Meeting will be held fortnightly in all stations providing opportunity to all employees to air their grievances, for whistle-blowing or for giving suggestions.
- b. **Suggestion Box.** Suggestion boxes shall be placed in all stations at convenient spots to be utilized for dropping complaints. Boxes shall be emptied by Human Resources representative or person so appointed by Director HR / Regional Director.
- c. **Direct Correspondence.** A prospective whistleblower can also make direct correspondence with Director HR on following address: Director HR 12th Floor Kawish Crown Plaza Shahrah-e-Faisal Karachi.
- d. Suggestion Form attached as Annex A may be used by the complainant. The same will be available on the website. Alternatively, a complaint can be made on a simple piece of paper also.
- e. This procedure includes anonymous reporting of concerns from internal and external stakeholders. SMS will make an effort to maintain anonymity of the informant.

D. **Proceedings**

- a. Director HR will hold a meeting attended by all relevant officials from concerned departments, HR and RCS ("Complaints Committee) to discuss the issue raised by the complainant and designate a Lead Investigator.
- b. Cases of 'emergence nature' will be dealt with on a fast track.
- c. The Lead Investigator will promptly determine the scope of the investigation and any additional information it needs in order to conduct the investigation.
- d. The Lead Investigator will promptly investigate the reported concern and communicate the results of the investigation in reasonable detail to the Complaints Committee, including a

description of the reported concern, the steps taken in the investigation, any factual findings and the recommendations for corrective action, if applicable. The Lead Investigator will investigate root causes of the reported concern to determine any opportunities for improvement and measures to avoid a recurrence. Depending on the scope of investigation, the ANSI/ASIS.INV.1 2015 *Investigations* standard will be consulted.

- e. Decision taken will be intimated / implemented through command channels.
- f. Chairman will be briefed on a monthly basis about the points / suggestions / grievances received, actions initiated and preventive measures taken.
- g. If appropriate the point will be brought up in HRRC Committee / SMG by Director HR