



Estd.

1860

MURREE BREWERY COMPANY LIMITED





WHISTLE BLOWING POLICY-SPEAK OUT TO IMPROVE

Introduction

- **Purpose**

- The purpose of this Whistle Blowing Policy is to create an environment by promoting a culture at Murree Brewery Company Limited where the employees and outside parties are encouraged and feels confident to reveal and report, without any fear of retaliation, subsequent discrimination and of being disadvantaged in any way, about any fraudulent, immoral, unethical or malicious activity of conduct of Employees/ Management or Board, which in their opinion may cause financial or reputational loss to the company.
- The company's internal control and operating procedures are intended to detect and to prevent or discourage such activities; however, even the best systems of controls cannot provide absolute safeguards against irregularities. Therefore, all employees are encouraged to report any such activity or act/ misconduct that may cause financial or reputational loss to the company.

- **Applicability**

- The policy encourages to raise voices against wrong doing, fraud, bribery, discrimination, black mailing, stealing, noncompliance of law etc.
- However, the complaints/ grievances can be for the larger good of the company and not against the company policies and procedures.

- **Availability and Authority**

- This policy shall be available at HR Office as well as on Company's website.
- Head of Internal Audit and Secretary HR & R committee shall be the authorized persons on behalf of the Board Audit Committee, to be contacted through e-mail address (complaints@murreebrewery.com) by the whistle blower for his/ her complaint(s) in writing at given e-mail address by disclosing his/ her identity.



WHISTLE BLOWING POLICY



The Company encourages Whistle Blowing to raise the issue directly to authorized persons provided that: -

- The Whistle Blower has sufficient evidence(s) to ensure genuineness of the fact after proper investigation at his/ her own end.
- The Whistle Blower understands that his/ her act will cause more good than harm to the Company and he/ she is doing this because of his/ her loyalty with the Company and
- The Whistle Blower understands the seriousness of his/ her action and is ready to assume his/ her own responsibility.

The management understands that through the use of a good Whistle Blowing Plan, they can discover and develop a powerful ally in building trust with its employees and manage fair and transparent operations. The Company therefore provides a mechanism whereby anybody who meets the above referred conditions can report any case based on merit without any fear of retaliation and reprisal.



Guidelines and Procedures for Whistle Blowing:

The basic requirement of this policy is:

- The whistle blower must disclose his/ her complete identity like; name, address, contact number and CNIC etc.
- The whistle blower must be available in person in front of designated forum of whistleblowing.
- And have enough evidence for the accusation he/ she made.

Details of Whistle Blower:

Name:	
Address:	
CNIC:	
Contact Number:	
Complaint against:	
Complaint Details:	

Conduct for Whistle Blower:

- a) Acts in good faith;
- b) Have reasonable grounds to suspect that the protected disclosure indicates that the company or regulated person has contravened or intends to contravene any administrated legislation;
- c) Refrains from making false accusations;
- d) Takes reasonable care to protect sensitive information and restrict disclosure to the relevant persons/ authority only;
- e) Ensures that the protected disclosure is accurate and complete to the best of his/ her knowledge;
- f) Provides original information in written form by disclosing his/ her identity.
- g) Provides complete evidence at his/ her disposal to aid investigation of the issues reported.



1. Protection to Whistle blowers

- The company stands committed to protect whistle-blowers against any kind of retaliation, harassment or victimization/ discrimination etc. and
- No disciplinary action against the whistle blower.
- Transfer against his/ her will.
- Demotion on the basis of dislike or personal grudges.
- Withholding or suspension of his/ her salary and/ or benefit payments.
- The information given and the identity of the whistle blower will be kept confidential until the correctness of the allegation/ complain is not proved.
- However, protection that Company can extend to Whistle Blower is limited to the company's capability, but any retaliatory action against any whistle blower as a result of whistle blown by such person under this policy shall be treated as Misconduct and subject to disciplinary action against the responsible.





Misuse of the Policy

- It is expected from all employees to refrain from rumour mongering, irresponsible behaviour and false allegations.
- If staff have doubt and not confirmed about the correctness of the allegation than he/ she must not rise until he/ she have solid evidence of misuse of authority, corruption, misconduct etc.

Disciplinary Action

- If involvement of the company's officials in fraudulent, immoral, unethical or malicious activities and other malpractices is proved during investigation of the case then disciplinary action will be initiated as per applicable rules and procedures of the company.
- If, however, staff makes malicious or frivolous allegation(s)/ complaint(s) or misuse the policy for undue posting/ transfer of him/ herself on disclosure to team member/ senior about whistle blown or the shelter available under this policy, action may be taken against them after proper investigation, **up to the extent of termination of employment.**
- If any director makes malicious or frivolous allegation(s) or misuse the policy then the matter shall be forwarded to Board of Directors and action shall be taken as per corporate and companies law.
- For external parties, the company on the basis of investigation report and recommendations of Board of Directors, may consider taking appropriate legal action against the concerned party(ies).


29/1/19.
Chief Executive Officer