

WHISTLE BLOWING POLICY

Purpose

The objective of this policy is to develop a whistle blowing mechanism for Adamjee Life Assurance Company Limited; the purpose of this policy is to expose cases of discrimination, corruption, fraud, and illegal practices in order to provide a mechanism to redress them. In doing so the suspicious case(s) is reported to the appointed authority, and well in time to avoid financial or non-financial loss to the company.

Scope

This policy shall apply to all employees of Adamjee Life. Through this policy, the employees are encouraged and empowered to confidentially participate in the whistle blowing practice, without fear of reprisal, or repercussions, using the defined reporting channel. This further includes, but is not limited to, the customers, suppliers, and contractors—collectively referred hereafter as stakeholders of the company. The applicability of this policy is for internal purposes only, in that the whistle blower should contact or address the matter internally to the appointed authority within Adamjee Life.

This whistle blowing policy does not apply to the following matters:

- 1) Employees' career related issues like salary reviews, promotions, transfers, relocations, training, attendance etc. for which separate policies and procedures exist i.e., Grievance Policy and Disciplinary Policy;
- 2) Operational level complaints and grievances; and
- 3) Where whistle is blown anonymously.

Matters to be reported

Any action or behaviour which is to be regarded as unethical or illegal, and is generally considered inappropriate or harmful to someone individually, or collectively for majority or all employees of Adamjee Life, shall be reported under the whistle blowing mechanism. Such actions and behaviour include, but are not limited to, misconduct, violation of laws, rules, regulation, policies, harassment, abusive and threatening treatment, fraud, corruption, and misuse of authority.

Policy Review

This policy is scheduled to be reviewed every 12 months; however, Human Resources Department may review and amend its content as and when needed.

1 WHISTLE BLOWING MECHANISM

The Head of Human Resource Department (HoHR) shall be the sole individual authority to whom all whistle blowing cases shall be directed. A separate email address shall be set up for the HoHR for the purposes of whistle blowing which will be kept independent of the official email address, and autonomous of the Company's domain. All stakeholders shall be informed about the mechanism and shall have access to the email address. The whistle blower must use his/her private email address for the purpose of maintaining confidentiality. This email address, however, shall only be used for whistle blowing purposes and strict confidentiality shall be maintained for all emails and matters reported thereof.

Whistle blowing shall be encouraged in order to highlight significant issues at the right time, to prevent the company from possible financial and non-financial losses and to ensure that no employee shall be able to misuse his/her authority. Hence, all employees will be provided unrestricted access to the email address: **[whistleblow.adamjeelife@gmail.com]**, to facilitate the whistle blowing process. For those stakeholders who are not able to blow whistle through email, access to HoHR through mobile phone (not landline phone), or by post shall also be made available, as a secondary source.

In circumstances when whistle needs to be blown against HoHR, such whistles shall be blown directly to the Chairman of HR Committee Board of Directors of Adamjee Life at [whistleblow.hrc@gmail.com] of the Chairman for the purpose.

1.1 Rights of Stakeholders

Every stakeholder shall have certain rights under this policy. All stakeholders shall have the right of protection from the company when they blow whistle against malpractices/unacceptable behaviour. They shall be protected from being dismissed after blowing whistle and their authority and rights to working condition shall not be impaired. It shall also be ensured that the whistle blower does not face any kind of harassment or harsh treatment, directly, or indirectly due to their reporting action.

All concerns of the stakeholders regarding whistle blowing, and all matters reported shall be answered in a timely manner, with appropriate feedback. This shall ensure to the stakeholders that their concerns have been dealt with by the management.

These rights shall only be with regard to whistle blowing, other rights shall be dealt with according to the prevailing rules of employment, laws, and regulations.

1.2 Duties of Employees

It shall be the duty of every employee to report matters in his/her knowledge which need to be reported under this policy. The employee or any stakeholder blowing the whistle can report suspicion and may submit proof of misconduct, malpractice, or inappropriate behavior.

The responsibility to investigate the matter and obtain evidences for the same, shall remain with HoHR.

The stakeholder may be a witness to the wrongdoing and shall have sufficiently valid reasons to be suspicious. However, the stakeholder blowing the whistle shall provide sufficient explanation regarding the matter, such as, what caused the suspicion, any instances available, involvement of any other person, etc. to facilitate the investigation. Once the matter is reported under whistle blowing, the whistle blower shall not discuss the matter with any other individual, in order to avoid jeopardizing the internal investigation.

The company has the legitimate authority to take action against any stakeholder, particularly an employee of the company, who is found to have knowingly been a part of the misconduct being reported.

1.3 False Allegations

Deliberately making a false claim is also considered an allegation under this Policy and may lead to disciplinary action being taken against the whistle blower. Therefore, all stakeholders are cautioned against misusing the whistle blowing policy to maliciously make false allegations or to seek personal gain.

1.4 Investigation of the Matter

Any matter reported by the whistle blower shall be investigated by the HoHR, or under the authority of Chairman in cases where the whistle is blown against the HoHR. The HoHR shall investigate the matter diligently, in a timely manner, upholding professionalism at all times and may delegate the investigation to any individual or department as deemed appropriate by him/her. However, the HoHR shall ensure that the investigation is dealt with strict confidentiality and the rights of whistle blower are maintained at all times during investigation. After the investigation has been concluded and appropriate action has been taken, the matter may or may not be disclosed at the discretion of the HoHR. The HoHR shall have the right to perform any task, or deploy any tools or techniques as required, to investigate the matter effectively.

1.5 Training of Employees

It is the responsibility of the Training department to train all employees on how to utilize the whistle blowing mechanism, to effectively address significant issues and blow whistle against wrongdoers, to safeguard the company from possible financial and non-financial losses. The stakeholders shall be instructed on the proper mechanism to report the suspicion of significant matters along with clear explanations of their allegation, such that insignificant matters are not routed through the whistle blowing mechanism, to make the process more effective. All employees shall also be informed about the reasons as to why anonymous whistle blowing shall not be applicable. Training materials may be developed, and workshops or training

sessions be conducted, to make employees aware of the policy and sufficient guidelines shall also be made available, and their access be open for all stakeholders.

The policy and its related documentations shall be made available on the website and a designated official shall be made responsible to address any queries related to this policy. A *Frequently Asked Questions* section, or a designated email address may be also developed to facilitate stakeholders in using the policy.

Stakeholders, particularly employees, shall be trained to identify the appropriate issues which are worthy of investigation, such that the insignificant problems are not reported against the mechanism, in order to maintain the significance of whistle blowing. Detailed scenarios may be developed to show examples of matters which are severe, versus those which are not.

1.6 Confidentiality

Strict confidentiality shall be maintained for all matters related to whistle blowing. It shall be the responsibility of the HoHR to ensure that all communications and investigations shall not reveal the identity of whistle blower unless his/her permission is expressly obtained.

1.7 Role of Internal Audit Department

The Internal Audit department of Adamjee Life could play a prominent role in the whistle blowing mechanism. On the will of the HoHR, the Internal audit may be asked to assist in the investigation as an independent department, and during investigation, it shall emphasize on the aim of the whistle blowing mechanism; which is to maintain parity within the company and should therefore not be misused for ill-intensions or personal enmity. In such cases the Internal Audit department shall be accountable for ascertaining the intensions of the whistle blower, in addition to investigating the circumstances which lead to the misconduct in question. These tasks shall be separate from the tasks that the Internal Audit department is generally required to undertake. Any member of the Internal Audit department can also blow the whistle according to this policy. Further, for all matters reported and investigated, the Internal Audit department shall analyze and control the weaknesses in the system and suggest appropriate rectifications.

1.8 Clarifications

The process of whistle blowing shall be used to highlight the weaknesses in the system, and to rectify them promptly, rather than to encourage complaints of individuals against one another, which would be counterproductive. The process should only aim to identify those individuals who, due to their inappropriate actions or behavior, may cause severe losses to the company, either financial, non-financial, or both. Another objective is to take appropriate and timely action against them, so that such behaviors or actions are not repeated. The type of actions against which whistle is to be blown, shall be as mentioned in this policy. Further any particular

information or an advice required on either a particular or general matter, shall not be part of whistle blowing as well.

It may be required by the regulatory authorities to report certain wrongdoing to the regulator or in the public interest. Such reporting shall be dealt with as a separate matter and shall not form part of this whistle blowing mechanism.

1.9 Compliance of Whistle Blowing Policy

This Whistle Blowing policy shall be applicable to all employees of Adamjee Life, both as whistle blower as well as those against whom whistle is blown. The culture of the company shall be developed as such that it does not discourage whistle blowing. Suitable control environment shall also be developed within the company to avoid matters arising which needs to be reported. The management of the company, particularly the HoHR shall decide upon the consequences of matters reported, such as, whether to dismiss the wrongdoer, or to serve warnings. The decision shall be based on the severity of wrongdoing as well as the likelihood of its reoccurrence, and it shall aim to forbid stakeholders to carry out any wrongful action or behavior in future. However, care shall be taken that through implementation of whistle blowing mechanism employee satisfaction and working relations with company's external parties are not impaired.

1.10 Reporting

The HoHR shall report the status of the whistle blowing mechanism on a bi-annual basis to the Board's Human Resource Committee, if any. The status shall include, at minimum, the cases reported, if any, actions taken, causes of wrongdoing, and improvements implemented in the processes, as a result.

1.11 Display of Whistle Blowing Policy

This Whistle Blowing Policy shall be displayed at the prominent places of office premises and at the company's website, to enable stakeholders be aware of the policy, and effectively utilize it for the greater benefit of the company.