Q. What is the Whistleblowing Policy and Program

Whistleblowing Policy and Program encourages stakeholders to use the guidance provided in the policy to "blow the whistle" on "improper, illegal, unethical or immoral practices" and provide a procedure for filing and addressing whistle-blower matters.

Q. What is whistle blowing

The term whistle blowing refers to an act of raising concerns about actual or potential violation of the code of conduct including misconduct, unethical behavior, fraud/ forgery, bribery, corruption, money laundering, terrorist financing, insider trading, password sharing, alleged dishonesty, danger to health & safety, bullying, harassment including sexual harassment, discrimination, regulatory misreporting, questionable accounting, auditing and financial reporting practices, breach of law, unauthorized use, unethical / unfair practices or illegal activity occurring within an organization that may lead to financial, regulatory or reputational loss.

Q. What is the difference between anonymity and confidentiality

A whistle blower raises a concern confidentially if he or she gives his or her name only on condition that it is not revealed without their consent. If the Bank is bound to disclose it under the law, then in that case consent from the whistle blower would not be required. An employee or any other whistle blower raises a concern anonymously if he or she does not give his or her name. Usually, the best way to raise a concern is to do so openly.

Q. Can concerns be raised confidentially or anonymously

Whistle blowers are encouraged to put their names to allegations/ concerns raised in order to facilitate follow-up questions and investigation. Only those anonymous complaints where either material evidences, concrete facts, objective data and logical information are provided shall be considered for initiating initial inquiry / investigation.

Q. Why did the BML develop this Whistle Blowing Policy and Whistle Blowing Program

Bank endeavors to achieve a culture of openness and accountability along with maintaining highest ethical standards in all its practices. In line with that commitment, it encourages all its stakeholders, including employees (all permanent, temporary and/ or contractual staff, intern and ex-employees), customers, directors, suppliers, vendors, contractors, consultants, service providers, shareholders or any other representative of the bank to raise matters of serious concern through whistle blowing mechanism; rather than ignoring the problem or blowing the whistle outside.

Q. On what kinds of "improper, illegal, unethical or immoral practices" can I blow the whistle

You can blow the whistle on actual or potential violation of the law and/or code of conduct including, but not limited to, misconduct, unethical behavior, fraud/ forgery, bribery, corruption, money laundering, terrorist financing, insider trading, password sharing, alleged dishonesty, danger to health & safety, bullying, harassment including sexual harassment, discrimination, regulatory misreporting, questionable accounting, auditing and financial reporting practices, breach of law, unauthorized use, unethical / unfair practices or illegal activity occurring within an organization that may lead to internal financial, regulatory or reputational loss.

Q. What should I do if I want to blow the whistle-how do I do it and to whom do I go

Whistle blower shall raise his/her concern using any of the following channels for whistle blowing:

- **Email:** whistleblowing@bankmakramah.com
- **Postal Mail:** Head of Internal Audit – Bank Makramah Ltd, Plot # 29, Select Center, F-11 Markaz, Islamabad, Pakistan
  Head of Quality Assurance & Special Assignments, 12th floor, BML Plaza, Mumtaz Hasan Road, Off I.I Chundrigar Road, Karachi.
  All such mails should be marked "confidential" on the outer envelope.
- Whistle Blower also have the option to submit their concern by completing the "Whistle Blowing Form" which available on Bank's website.
- Whistleblowers shall preferably share their identity enabling to provide protection in accordance with Whistle Blowing Policy.

Q. Will my whistle-blower report be held in confidence

Confidentiality will be maintained within the limitations of law and policy and the legitimate needs of the investigation.

Q. What if I am not sure whether certain actions or conducts are considered as improper, illegal, unethical or immoral practices, should I still report it

Yes. The whistle blow unit will decide whether the matters for which whistle is blown are classified improper, illegal, unethical or immoral practices.

Q. What information should I provide when I make my disclosure

You should state the facts with as much specific information as possible so that your allegations can be investigated; such as brief the matter with clarity (with the name of person/department/branch involved), money amount involved (if any), time since matter existed, evidence if any (documentary or descriptive), brief remedial action that you suggest.

Q. What happens after I file my whistle-blower report

After an initial assessment as to the appropriate treatment of each whistle blow matters detail assessment, investigation, or evaluation of the whistle blow matters would be conducted by the Consulting & investigation Unit, FRMU & HR-RM as the case may be. The investigation team will investigate the matter and will present its report / finding to the whistle blow unit. The Competent Authority will take the decision on the basis of the investigation report.

Q. Why might my allegations not be investigated

Sometimes stakeholders blow the whistle about things that aren't illegal, immoral, unethical or improper, but are related to individual's personal grievances related to performance appraisal, promotions, bank provided benefits, compensation, discipline & concerns related to job posting etc. are not dealt in whistle blowing policy and whistle blowing program and reported to Human Resources. The preliminary investigation assesses whether or not there appears to be an illegal, immoral, unethical or improper activity.

Q. How can I help with the investigation

You can provide as much factual information as possible in order to allow the investigation to proceed. However, don't obtain any evidence for which you do not have a right of access and don't do your own investigation-leave that to the experts.

Q. Can I blow the whistle for routine complaints

For routine complaints there is a designated customer resolution unit established by the bank. Account statements not received, customer grievances, incorrect record of particulars, transactions not processed are some of the examples of the routine complaints. All kind of these routine complaints shall be reported to the bank's Customer Resolution Unit or Phone Banking instead of Quality Assurance and Special Assignments/ whistle blow unit.

Q. Can I blow the whistle for HR related matters

Only those HR concerns may be reported which have an entity wide implications or which are significant in nature. Further whistle can also be blown in case of inconsistent implementation of HR policies which comes to the knowledge of the employee. However, this does NOT include complaints of personal nature involving the employee himself / herself.

Q. Can I discuss the matter with friends and colleagues

To protect your confidentiality and the confidentiality of the investigation, it is advisable not to discuss the matter with friends and colleagues.

Q. The Whistle Blowing Policy and Whistle Blowing Program is long and detailed and I want to properly blow the whistle. Where do I go for help

You can contact Whistle Blow Unit – Ethics & Conduct in order to get help for blowing the said whistle.

Q. If I file a blow a whistle, and if investigations find that there are no grounds for actions, will I be adversely impacted

As covered in the whistle blowing program only those who are found to have acted maliciously will be subject to appropriate actions.

Q. Will I be protected from retaliation

Yes, safeguarding whistle blower is the foremost responsibility. Management will ensure that stakeholders will not be at risk of suffering any form of retribution as a result of concerns raised/ potential fraudulent practices reported by him/her; no matter whether the same are being proven or not; provided that he/she is acting in good faith and in a reasonable manner. There is zero tolerance against harassment or victimization of anyone raising a whistle blowing. Any such act by the accused or other stakeholders, whether inside and outside of the bank's premises will be treated as gross misconduct, which if proven, may result in disciplinary and/or other legal action(s) against the person involved.

Q. Can I withdraw whistle blown by me if I made a mistake

Yes, you can. Kindly forward your request via the channels that you have raised the matter with the case reference number stating reasons for withdrawal.