

Blow the Whistle - TPL

TPL upholds the utmost standards of business ethics and management practices in its operations. The company is dedicated to the highest levels of transparency, integrity, and accountability.

Directors and employees often identify situations requiring corrective measures within the company. The Whistle Blowing Policy (the “**Policy**”) aims to ensure that not just directors and employees, but also any other individuals – such as vendors, customers, subcontractors, consultants, trainees, shareholders, former employees, or any other external parties can easily voice their concerns about potential violations without any apprehension of facing retaliation.

The Policy, serves as a means to swiftly and directly notify the Management of any unethical conduct, suspected fraud, misconduct, or irregularities in the company's practices that do not align with TPL's Code of Conduct (CoC) or the local laws. This mechanism is designed to provide responsible individuals with the assurance that they can report such concerns without the risk of victimization or retaliation.

The Policy expects all individuals affiliated with TPL to uphold TPL's core values and its corporate mission. The underlying principle of this Policy is to promote a collective sense of responsibility for safeguarding the company's business interests. It offers a channel for reporting matters directly to the Whistle Blowing Committee, with provisions for confidential reporting. This Policy establishes a vigil mechanism, allowing every employee and individuals mentioned above to report legitimate concerns.

The Policy strengthens the Management's commitment and cooperation in protecting the interests of those who choose to report actual or potential violations of the Code of Conduct (CoC) and applicable laws. This commitment also ensures that the Policy is not subject to misuse.

WHISLE BLOWING POLICY

Disclosure in Confidence with Confidence

1. AIM AND SCOPE OF THE POLICY

(a) This Policy aims to:

- Provide avenues for Directors, employees or any other persons including vendors, contractors, sub-contractors, consultants, trainees, shareholders, customers, former employees or any other third parties to raise concerns and receive feedback on any action taken;
- Provide avenues for Directors, employees or any other persons to report breach of Company's policies
- Reassure Directors, employees or any other persons that they will be protected from retaliation or victimization for blowing the whistle in good faith.

(b) There are existing procedures in place to enable employees to lodge a grievance relating to their own employment. This Policy is intended to cover concerns that fall outside the scope of other procedures. That concern may be about an act or omission that:

- is unlawful or in breach of any law;
- is against the Company's Polices;

- falls below established standards or practices; or
- Amounts to improper conduct, unethical behavior or suspected fraud.
- To motivate the Company's employees to act with honesty and loyalty, independently safeguarding the Company from potential financial or reputational harm resulting from fraudulent, immoral, unethical, or malicious activities or misconduct by certain dishonest individuals.

2. SAFEGUARDS

(a) Harassment or Victimization

The Company recognizes that the decision to report a concern can be a difficult one to make, not least because of the fear of retaliation from those responsible for the malpractice or from superiors. The Company will not tolerate harassment or victimization and will take action to protect individuals when they raise a concern in good faith. In case a whistle blower is already the subject of any disciplinary action, those procedures will not be halted as a result of their whistle blowing.

(b) Confidentiality

The Company affirms that all such matters will be handled in confidence, and the identity of the whistle blower shall remain undisclosed unless unavoidable circumstances necessitate such disclosure. This may include situations where revealing the whistle blower's identity is crucial and required in court of law, or when disclosing the complaint report is essential for those individuals with a legitimate need to know in order to conduct a thorough investigation.

(c) Anonymous Allegations

Individuals may raise concerns anonymously. Concerns expressed anonymously will be evaluated by the Company for investigation. In exercising this discretion, the factors to be taken into account would include:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

d) False Allegations

In the event that the whistle blowing raises an allegation in good faith, and the subsequent investigation does not find any evidence against the allegation, no repercussion will be imposed on the whistle blower. However, should the complaint be determined to be malicious or vexatious, made in bad faith, disciplinary measures will be implemented against the whistle blower.

3. RAISING A CONCERN - PROCEDURE

(a) Operational concerns shall be raised with the Line Manager or Skip Line Manager. The whistle blowing mechanism should be reserved for potentially serious or sensitive issues involving a material breach of the Company's Code of Business Conduct and Practice.

(b) Employees should first address the concerns with the relevant Line Manager or Skip Line Manager. In the event, the Line Manager or Skip Line Manager is the subject of the complaint; employees can directly contact the Whistle Blowing Committee. The said officer will then forward the concern to the appropriate body formed by the Company for such purposes.

(c) It is advised to raise any concerns in writing. In the case of serious concerns, the whistle blower may also directly approach the Chairperson of the Whistle Blowing Committee, who can be reached out through the following email id:

nader.nawaz@tplcorp.com

Alternatively, individuals can also use any of the following channels to report a concern:

- Write to Manager
- Email at whistleblow@tplcorp.com; or
- Call at this number 021-37130227; or
- Visit the website www.tplcorp.com

(d) The background and history of the concern, names, dates and places where possible, should be set out in the complaint along with the reason why the individual is particularly concerned about the situation.

(e) The complainant is not expected to prove the truth of allegation, but should be able to demonstrate that there are sufficient grounds for concern. All concerns must be raised immediately. This will support investigation process and enable faster implementation of corrective actions, if any.

4. HOW THE COMPLAINT WILL BE DEALT WITH

(a) The concerns raised may:

- form the subject of an independent inquiry;
- be investigated internally;
- be referred to the external Auditor; or
- be referred to the police; if required.

(b) Upon receipt of a concern, an initial enquiry will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may also be resolved by an agreed action without the need for investigation.

(c) After the concern has been evaluated, the Company will write to the complainant:

- acknowledging that the concern has been received;
- indicating how it is proposed to be dealt with;
- informing whether further investigations will take place, and if not, why not.

(d) The amount of contact between the body considering the issues and the complainant will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, further information will be sought from the complainant.

(e) The Company will take steps to protect the whistle blower from victimization and minimize any difficulties which a person reporting under whistle blowing may experience as a result of raising a concern.

(f) The Company accepts and would take such steps as may be required to assure the whistle blower that the matter has been appropriately addressed.

5. REPORTING

The concerns raised under whistle blowing shall be reported periodically to Whistle Blowing Committee of the Company.

6. ADDRESS FOR REPORTING AND COMMUNICATION

Email: whistleblow@tplcorp.com

Write to: Whistle Blowing Committee

Address: TPL Corp, 20th Floor, Sky Tower-East Wing, Dolmen City, HC-3, Abdul Sattar Edhi Ave, Block 4 Clifton, Karachi, Pakistan.

Call: 021-37130227

Web: www.tplcorp.com

Whistle Blowing Form

Note: We assure that all of your information will be securely preserved within our database while maintaining strict confidentiality.

Anonymous Disclosed

Title. Mr. Ms.

If other, please specify. _____

Is the person submitting the complaint an/a

- Employee
- Customer
- Vendor
- Other

If other, please specify. _____

First Name: _____

Last Name: _____

CNIC Number: _____

Phone Number: _____

Cell Number: _____

Email Address: _____

Mailing Address: _____

Would you like to schedule a meeting / telephone call with our representative to discuss your concern?

Yes No

Incident Report:

Location:

