



# **SUI NORTHERN GAS PIPELINES LIMITED**

## **WHISTLEBLOWING AND PROTECTION MECHANISM**

---

### **SYNOPSIS OF THE POLICY**

## 1. INTRODUCTION TO WHISTLEBLOWING

Sui Northern Gas Pipelines Limited (SNGPL) is committed to conduct the business with highest possible standards of honesty and integrity and accordingly, Company's internal controls & operating procedures are intended to achieve the same. Despite having best system of internal controls, all organizations face the risk of misconduct or illegal/dishonest activities. "Whistleblowing" creates a culture of openness and accountability to prevent such situations from occurring or to address them when they do occur. It also encourages and enables all concerned to disclose as soon as possible, any legitimate concerns in every area of its operation. Whistleblower referred to as a "Complainant" later in the policy is a person who exposes, using designated channels, any information or activity that is deemed illegal, unethical, incorrect or involve misappropriation of Company's assets.

## 2. POLICY STATEMENT

All employees, Management, Board and every individual associated with the Company including ex-employees, contractors, suppliers, business partners, consumers and shareholders etc. are encouraged and have been enabled to report without fear of reprisal or repercussions, in confidentiality, under defined reporting channels, any matter coming to their attention which may concern the Company's operations, assets, reputation and finances.

## 3. OBJECTIVE OF THE POLICY

The objective of this policy is to:

- provide a confidential and secure mechanism to encourage Company employees and other stakeholders to report any matter coming to their attention which is against the interest of the Company;
- define mechanism to address the concerns raised in a confidential and timely manner;
- define a protection mechanism for the whistleblower from possible reprisals or victimization;
- define reporting mechanism regarding whistleblowing policy and concerns raised there under in order to ensure compliance with applicable rules and regulations.

## 4. SCOPE OF THE POLICY

The policy covers all matters raised through defined channels that may involve any act of vandalism, or a behavior that is unsafe, unlawful or unethical with respect to the Company's Code of Conduct including but not limited to:

- Offence/breach of law or failure to comply with legal obligations;
- Violation / non compliance of Company's policies / procedures;

- Corruption, bribery, theft or blackmail;
- Any act causing health and safety risks to the public/employees or damage to the environment;
- Causing damage/loss to Company's assets or reputation;
- Possible fraud, tax evasion or incorrect financial reporting with mala fide intentions;
- Illegal/unauthorized use of Company's data/information, assets or funds;
- Unethical/unauthorized representations on media/social media which is against the Company's interest;
- Failure to investigate allegations of workplace harassment;
- Actions which are unprofessional, inappropriate or in conflict with a general understanding of what is right or wrong / unethical; and
- Miscarriage of Justice.

This is not an exhaustive list and any other related matter raised under this policy will be considered seriously other than consumer complaints of general nature which are dealt with separately under Company's defined procedures.

## 5. PROCEDURE FOR LODGING COMPLAINTS

**5.1.** Complainants may report their concerns preferably through email directly to the Head of Internal Audit @ [wb@sngpl.com.pk](mailto:wb@sngpl.com.pk). However following methods may also be used to raise Concerns:

- Through courier in the name of Head of Internal Audit;
- Putting complaint in dedicated whistleblowing boxes placed within Head office premises.

**5.2.** Whistleblowing policy requires the complainant to disclose his/her identity. No action shall be taken on a whistleblower's information / complaint if the disclosure does not indicate the identity of the whistleblower or the identity of the whistleblower is found to be incorrect or false.

Complainant shall disclose following information:

- Full name; \*
- CNIC No. or Copy of CNIC (Employee ID in case of employee); \*
- Contact Number; \*
- Email address; and
- Postal Address for further communication.

*Note: Credentials marked (\*) are mandatory.*

If a complainant does not provide his/her credentials as aforesaid or does not respond on two attempts by Internal Audit to contact him/her at given credentials, such complaint shall be considered as "anonymous".

## 6. PROTECTION MECHANISM FOR THE WHISTLEBLOWER

It is understandable that complainants are sometimes worried about possible repercussions. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

### ***CONFIDENTIALITY***

- The Company undertakes to handle all complaints in complete confidence and promises that it will under no circumstances reveal the identity of the complainant during the investigation or subsequent to it. However, if the investigation leads to legal proceedings, the Company may be required or legally obliged to reveal his/her identity. If this is the case, the Company will take all reasonable steps to ensure that the whistleblower suffers no harm.
- The whistleblower should also be required to keep it confidential that a complaint has been filed, the nature of the concerns and the identity of those involved.

### ***PROTECTION AGAINST DISADVANTAGUES MEASURES***

- Employees reporting a concern about any of the above matters are assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if the concerns turn out to be unsubstantiated.
- Full protection shall be provided to the complainant in good faith against any disadvantageous measures including but not limited to unfavorable penal action, loss of status of work, transfer, unfavorable performance evaluations, harassment/threat of any of these measures, and/or any other unlawful adverse action.
- If a whistleblower is being subjected to any disadvantageous measures or is likely to be subjected to on the ground of whistleblowing, such action shall be treated as misconduct and will be subject to disciplinary action.
- If this is the case, whistleblower may file an application to Head of Internal Audit seeking redressal in the matter. Head of Internal Audit shall put up the matter before Chairman BAC who may pass such orders to the concerned persons as deemed appropriate.

## **7. POSSIBILITY OF FALSE ALLEGATIONS**

There exists a possibility of false, malicious or vindictive complaints raised on the basis of personal grudge. Complainants are urged to raise concerns with clear motivation that they are acting in the public interest or to protect the Company and its stakeholders. Deliberately making a false concern is also an allegation under this policy and may lead to a disciplinary/legal action against complainant. Similarly if a Contractor, Service provider etc. makes malicious or vexatious allegations, the Company will consider dispensing with their services.

**WHISTLE BLOWING REPORT FORM**

Name: \_\_\_\_\_

CNIC No. : \_\_\_\_\_ (attach copy)

Contact No. \_\_\_\_\_

Designation / Grade: \_\_\_\_\_ (In case of Employee)

Emp. No.: \_\_\_\_\_ Location: \_\_\_\_\_

**Nature of Complaint?**

☐ Suspected Fraud      ☐ Malpractice      ☐ Corruption      ☐ Risk to Environment

☐ Workplace Harassment      ☐ Customer Complaint      ☐ Other \_\_\_\_\_

**Should your identity be disclosed during further probing in the matter?**

☐ Yes      ☐ No

**Additional Information:**

- Has this matter already been reported to any Higher Authority/Official ☐ Yes ☐ No
- If yes, to whom \_\_\_\_\_ (Name of official)
- Since when it is happening \_\_\_\_\_ (Year/month approximately)
- Impact on the Company i.e. ☐ Financial Loss ☐ Reputational Loss

**Background/Description of the Complaint:**

Please provide full details e.g. person involved, dates and place/location etc. (continue on separate sheet if required)

---

---

---

**Please state the reasons why you are particularly concerned about the situation.** (continue on separate sheet if required)

---

---

---

\_\_\_\_\_  
**Signature of the Complainant**

\_\_\_\_\_  
**Dated**