



Trellis Housing
Finance Limited

Whistle Blowing Policy

Trellis Housing Finance Limited

Document Review and Approval

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1. Introduction

Whistle blowing refers to the disclosure by an employee of serious, potentially criminal matters that have taken place or are taking place, or may take place within an organization, to his or her manager, independent manager, or an external body or organization.

Examples of such matters may include:

- All suspected fraudulent activity/serious management malpractices or unlawful behavior (e.g., theft, misrepresentation, insider dealing)
- Failure to comply with applicable regulations e.g., health and safety guidance
- Failure to comply with the HR policy or any other policies set out by the Company
- Reckless conduct or behavior in the workplace.

2. Scope of the Policy

Trellis Housing Financing Limited (“Trellis” or the “Company”) is committed to a *whistle blowing policy*, as it is in the interests of its employees, customers, shareholders and industry regulators. This document sets out the Whistle Blowing policy with the intent to achieve the response from our employees in accordance with the best practices of the industry and prevent the incidence of fraud and forgeries, which may impact the business and Company’s reputation. The policy covers following concerns/ disclosures:

- Conduct by anyone, which is an offence/breach of law.
- Failure to comply with legal obligations.
- Violation / noncompliance of Company’s policies / procedures.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment, Company assets and corporate image.
- Possible fraud /corruption / incorrect financial reporting with malafide intensions.
- Illegal use of sensitive company data or mishandling of confidential data
- Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right or wrong / unethical.
- Miscarriage of Justice

Trellis must be made aware of matters of malpractice covered by the above definitions of a qualifying disclosure. The details of any concern should be reported honestly, accurately and without malice. Trellis takes malpractice seriously. Practical examples of possible malpractice include for example fraud, insider dealing, money laundering, financial misrepresentation, drug or alcohol abuse and withholding evidence from an internal or external enquiry. Trellis will respect the wishes of staff raising concerns if they ask for confidentiality, but Trellis may need to act to protect its employees, clients and business.

3. Procedure of Reporting

Raising Concern - The employees shall normally raise concerns with immediate supervisor/manager. Depending upon the seriousness/sensitivity of the issues involved, a senior level of management within respective division/department may be approached. Irrespective of the issue being raised for redressal at the departmental level the employee may choose to adopt whistle blowing procedure based on confidentiality of the matter and report to the Head of Compliance through the following listed options.

All concerns are to be reported in writing to ensure a clear understanding of the issues being raised. It must contain the background, the nature of concern; relevant dates and timings where possible, the reasons for the concern and the names of individuals against whom the concern is being reported.

Whistleblowers may report their concerns through the following methods:

- i. **Confidential Call** - To make a confidential call; the Trellis employees may reach the whistleblowing unit at the given contact number: +923045954086
- ii. **E-mail** – wecare@trellisfi.com, which shall only be accessible to the designated authorities.
- iii. **Regular Mail** – address to Compliance Department (GHAR HO (Trellis Housing Finance Limited), Block C, Ground Floor, FTC Building, Karachi.)

It is preferable that whistle blowing concerns are raised as soon as one has a reasonable suspicion, and one is not expected to investigate his/her concern to prove its validity. In the first instance, one should raise any concerns he/she has with his/her reporting manager, director in charge or any other senior person within Trellis, with whom he/she feels comfortable. The manager, director or person in-charge will either act on the information that he/she has received from the whistleblower or pass it on to the relevant individual that can deal with it.

The best option is to inform the Compliance team, especially if the matter has a potential regulatory impact.

4. Roles and Responsibilities

Rights and Duties of the Whistleblower

The rights of the whistleblower will be safeguarded under all circumstances. Wherever possible, the person's identity will not be disclosed. Only in certain situations where the person's identity needs to be used to corroborate evidence will this be done after taking their consent. The 'Whistle Blowing' Policy is intended to cover serious public interest concerns that fall outside the scope of other procedures. It is the prime responsibility of the whistleblower to realize and identify and have a reasonable belief that the matter to be highlighted is either happening now, have happened, or likely to happen. There should not be any fear of repercussions for raising a valid concern, as long as it is done in good faith. The action taken by the competent authority will depend on the nature of the concern. The matters raised may:

- i. Be investigated internally by the senior management, Compliance, Internal Audit or through the disciplinary procedures as per HR policy.
- ii. Be referred to the law enforcement agencies, at senior management's discretion.
- iii. Be referred to the External Auditor (in selected cases based on the regulatory requirements).
- iv. Form the subject of an independent inquiry.

The 'Whistle Blowing' Policy and Procedure is primarily for concerns where, due to malpractice, fraud, abuse or other inappropriate acts/omissions, the interest of others or the organization itself is at risk. Staff have a right, and a duty, to raise with their employer any matters of concern they may have about health service issues associated with the organization and delivery of care. The whistle blower staff member should report his/ her concerns mentioning his/ her name, designation and functional department. The policy is designed to provide a clear commitment to staff that concerns will be taken seriously, and to encourage staff to communicate their concerns through the appropriate channels, however anonymous reports and complaints will not be entertained.

Responsibility of the Senior Management

All managers/ supervisors at every level of the organization have a duty to ensure that staff are provided with the opportunity to express their concerns. For accomplishing this the staff needs to be empowered so that they can express their concerns with confidence in confidentiality. Any discouragement or hurdles created by the

line managers for adopting means/ modes of addressing employee concerns which have been approved by the Board of Directors, shall in itself be considered as an internal policy violation and may invite serious repercussions and penal action by the competent authority.

5. Formal Investigation and Resolution Procedure

If the concern raised is very serious or complex, a formal investigation may be held. The investigation may need to be carried out under the terms of strict confidentiality i.e., by not informing the subject of the complaint until it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment, harassment, misappropriation of assets, etc. suspension from work may have to be considered immediately. The designated inquiry officer may offer to keep the complainant informed about the investigation and its outcome. If the result of the investigation requires, and there is a case to be answered by any individual, the competent authorities shall define measures and methods to be applied and the details discovered by the formal investigation, shall be documented as a formal investigation report.

Where there is no case to answer, but the employee held a genuine concern and was not acting maliciously, the designated inquiry officer will ensure that the reporting employee suffers no reprisals.

If there is no case to answer but there is evidence that the allegation was made frivolously, maliciously or for personal gain, disciplinary action will be taken against the complainant. The matter will be dealt with promptly at each stage. Where appropriate, immediate steps will be taken as a remedy for the situation as soon as practicably possible. A final outcome may take more time on case-to-case basis but a final resolution/outcome at each stage should ideally be available within ten working days from the date of receiving the complaint. The final investigation report shall be shared with the CEO for further action and resolution on a particular reported case.