TASKEEN HEALTH INITIATIVE

WHISTLE-BLOWING & ANTI-CORRUPTION POLICY

Prepared By:
Ravisha Ramani

Date: 20th June, 2022

Reviewed by:
Syed Kareem

Date: 20th June, 2022

Approved by:
COO / CEO

Date: 20th June, 2022

PURPOSE

This policy lays down Taskeen's commitment to transparency, accountability, protection, and respect for all individuals. It lays down protocol for all Directors, Board members, and employees across various hierarchical levels to notify genuine concerns without fear of reprisal.

WHISTLE BLOWING & ANTI-CORRUPTION POLICY

POLICY STATEMENT

Taskeen Health Initiative is committed to providing mental health services in an ethical manner and believes in safeguarding the assets it has been entrusted with by the public to fulfill its mission. Therefore, it is imperative that if any member of Taskeen comes across any behavior, activity whether in matters of financial reporting or any other matter which is suspected to be unethical and dangerous for Taskeen, then they report it immediately through the prescribed protocols.

Taskeen has zero tolerance for fraud, corruption, and bribery. This means that Taskeen does not accept any level of fraud, bribery, or corruption within and without the organization. Taskeen members and those working for or with us must pursue the highest standards of honesty and integrity in the exercise of their duties. Taskeen will uphold all laws and regulations relevant to countering fraud, corruption, and bribery in all the jurisdictions in which it operates.

POLICY AIMS

- Support and positively advance organizational values and mission.
- Ensure that employees, team members, company Directors, and third parties can comfortably raise concerns without risking their position or stake.
- Provide a transparent and confidential process for dealing with concerns.
- Taskeen will uphold all legislation relevant to countering fraud, bribery, and corruption.
- Taskeen will actively place checks and procedures to prevent fraudulent practices. It will also implement controls to remain alert to the risk of fraud, bribery, and other irregularities.
- Taskeen will ensure that corruption and other financial malpractices are duly identified and traced, and appropriate action is taken against perpetrators.

POLICY SCOPE

This Policy is applicable to all employees (permanent or contractual), directors, all stakeholders and vendors who are working with Taskeen. The below mentioned list gives some examples of the types of corrupt behaviours that fall under the purview of this policy:

- Sharing of confidential information with unauthorized individuals.
- Any kind of fraud or fraudulent activity.
- Misrepresentation of program data.
- Misrepresentation of financial data.
- Any kind of illegal activity as per the constitution of the Islamic Republic of Pakistan.
- Invalid promotion of an employee or benefits given to others.
- Illegal competitive behavior leading to a conflict of interest.
- Use of company assets for other than their approved purpose.

DUTIES AND OBLIGATIONS OF EMPLOYEES

- 1. If an employee or anyone from the organization has a concern about possible misconduct, the individual is obligated to report it instantly. The reporting can be done either orally or in writing. The report should include complete details of the matter coupled with supporting evidence wherever possible.
- 2. Employees may follow the following protocol to report their concern about unethical behavior of another member of staff, director, independent consultant, partner, supplier, or clients:
 - Report to their immediate line manager (or, if not appropriate);
 - Report to the HR Manager (or, if not appropriate);
 - Report to another member of the senior management team
- **3.** Employees who, in good faith, raise concerns covered by this policy shall be duly protected from any retribution, victimization and other detrimental treatment.
- **4.** Employees shall fully cooperate with any investigations conducted by Taskeen management.

DUTIES AND OBLIGATIONS OF TASKEEN

- 1. Taskeen values all concerns brought to our attention and treats them in accordance with this policy.
- 2. All concerns will be evaluated by the organization to decide whether the alleged misconduct falls under the purview of this policy, or any other policy is more appropriately applicable, and the management will respond to the concern within 2 days of receiving of complaints.
- 3. The person who is a whistleblower may or may not disclose his/her identity.
- **4.** Even if the whistleblower chooses anonymity, the complaint will be taken with utmost seriousness.
- **5.** The identity of the whistleblower will be kept confidential in all cases.
- **6.** Taskeen management must start the inquiry and come up with the report within 15 to 30 days from the receipt of the initial complaint.
- 7. During the course of any investigation, Taskeen will take particularly ensure that any person accused of alleged misconduct is fairly treated at all times. The accused shall have the right to present his/her own account of events at an appropriate stage of the investigation.
- **8.** The Taskeen management will investigate, and treat as a serious matter:
 - Allegations made by an employee which are not in good faith and are found to be false or malicious.
 - Actions by an employee to prevent someone from reporting a concern or victimizing the whistleblower post raising concerns.
- **9.** The management must suggest the corrective actions which needs to be taken by the immediate reporting manager or head of the department for implementation. In case the employee who is found to be guilty of any illegal wrongdoing will be penalized or terminated and by the HR department.
- **10.** The management will provide timely feedback on the reported concerns to update the whistleblower about the steps taken to address the concern.