




TASKEEN HEALTH INITIATIVE

WHISTLEBLOWER POLICY

Prepared By	Department: Human Resource	Date: 18th April, 2020
Approved By COO/CEO	Signature: 	Date: 25th April, 2020

Revision History Table			
Revision	Date	Description of Change	Approved by COO/CEO
1.0	1st July, 2023	First Annual Revision	
2.0	1st July, 2024	Second Annual Revision	
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A Company set up under section 42 of the Company's Act 2017
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WHISTLEBLOWER POLICY

POLICY STATEMENT

This policy is designed to encourage and enable employees and associated stakeholders to report any wrongdoing, unethical conduct, or corrupt practices within Taskeen, without fear of retaliation. It aims to foster a culture of integrity, accountability, and transparency across all levels of the organization.

Taskeen maintains a zero-tolerance policy for fraud, corruption, and bribery. This means that no level of fraudulent activity, bribery, or corrupt behavior is acceptable within or outside the organization. All members of Taskeen, as well as those working for or with the organization, are expected to uphold the highest standards of honesty and integrity in the exercise of their duties.

Taskeen is committed to complying with all applicable laws and regulations related to the prevention and countering of fraud, corruption, and bribery in every jurisdiction where it operates.

SCOPE

This policy applies to all individuals associated with Taskeen Health Initiative, including:

- Employees (Part Time and Full Time))
- Interns and volunteers
- Consultants and contractors
- Board members and management
- Partner organizations, where applicable

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.

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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.

DEFINITIONS

To ensure shared understanding, the following terms are defined:

- **Whistle-blowing:** The act of reporting misconduct, unethical behavior, or legal violations within the organization.
- **Whistle-blower:** A person who raises concerns in good faith about wrongdoing in or involving the organization.
- **Fraud:** Intentional deception for financial or personal gain, including theft, falsification of records, or misrepresentation.
- **Corruption:** Misuse of power or position for personal benefit. Includes bribery, nepotism, favoritism, and embezzlement.
- **Bribery:** Offering, giving, receiving, or soliciting anything of value to improperly influence decisions or actions.
- **Conflict of Interest:** A situation where personal interests interfere with official responsibilities or objectivity.
- **Retaliation:** Adverse actions taken against someone for reporting misconduct, including dismissal, demotion, threats, or harassment.
- **Good Faith:** Reporting a concern with an honest belief in its truth, even if not ultimately proven.
- **Misuse of Assets:** Use of organizational funds, equipment, or information for unauthorized or personal purposes.
- **Favoritism/Nepotism:** Unjust treatment based on personal relationships rather than merit or qualifications.

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1. REPORTING RESPONSIBILITIES AND PROCEDURE

Any person covered under this policy who suspects misconduct has a duty to report the concern as soon as possible. Reports may be made either verbally or in writing and should include as much detail as possible to enable effective investigation. Reports can be made confidentially or anonymously.

The reporting process follows this sequence:

- In the first instance, concerns should be reported to the employee's immediate supervisor or line manager.
- If the concern involves the supervisor, or if the supervisor is unable to address the issue, it should be escalated to the Head of Human Resources.
- If the matter involves the Head of HR or remains unresolved, it should be raised with the Chief Operating Officer (COO) or Chief Executive Officer (CEO).
- Concerns involving COO or CEO or unresolved matters should ultimately be reported to the Chairperson of the Board of Directors.

Taskeen encourages openness and will support individuals who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistleblowers will not face retaliation or any form of detrimental treatment.

2. INVESTIGATION PROCESS

Once a report of suspected misconduct or unethical behavior is submitted through the appropriate reporting channels, whether to a supervisor, the Head of Human Resources, the COO/CEO, or the Chairperson of the Board, the responsibility to assess and act on the complaint is delegated to the Human Resources (HR) Department, except in cases where:

- The Head of HR is directly implicated,
- Or there is a potential conflict of interest within the HR function.

In such exceptional cases, the investigation shall be led by the Chief Operating Officer (COO) or the Chief Executive Officer (CEO). If the concern involves the COO or CEO, the matter shall be handled directly by the Chairperson of the Board of Directors, who may form a special committee to conduct an independent inquiry.

Regardless of where the report is received, all investigations will be initiated and overseen in accordance with the standards and timelines outlined below:

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Upon receiving a report, Taskeen will conduct an initial assessment to determine whether the issue falls under the scope of this Whistleblower Policy or would be better addressed through another applicable internal policy. All parties, including the accused, will be granted the opportunity to present their version of events, and no prejudgment will occur before the conclusion of the investigation.

False or malicious accusations made with ill intent will be regarded as a serious offense and may result in disciplinary action against the reporting party.

2.1. Acknowledgement and Initial Assessment

The organization shall acknowledge receipt of the complaint within two working days and initiate a formal investigation within 15 to 20 days. This preliminary stage will include an assessment of the nature of the complaint, the severity of the allegation, and any immediate risks to involved parties.

If the whistleblower has opted for anonymity, Taskeen will still proceed with the investigation using available facts and evidence. All complaints, whether anonymous or identified, will be treated with utmost seriousness and confidentiality.

2.2. Investigation Protocol and Safeguards

Taskeen ensures that all investigations are:

- Timely – Commencing without undue delay and completed within a reasonable time frame;
- Impartial – Conducted by individuals with no conflict of interest in the outcome;
- Confidential – Respecting the privacy of all individuals involved and disclosing information only as required by law.

2.3. Issuance of Show Cause Notice

HR will issue a formal Show Cause Notice to the concerned employee within one month of the reported incident. This notice will outline the allegations and provide an opportunity for the employee to respond.

2.4. Employee Response

The accused employee will be given a fair opportunity to submit a written response. Their explanation will be reviewed as part of the broader inquiry process before any conclusions are drawn.

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2.5. Inquiry and Potential Suspension

HR will conduct an independent investigation into the matter. Depending on the gravity of the situation, the employee may be temporarily suspended during the investigation period to prevent any interference or undue influence.

2.6. Evidence Review and Management Recommendation

Once the investigation is concluded, all collected evidence and findings will be submitted to the Chief Operating Officer or Chief Executive Officer (CEO) for review. The CEO will evaluate the case and recommend appropriate action based on the evidence.

2.7. Termination and Enforcement

If the allegations are substantiated and constitute serious misconduct (e.g., fraud or corruption), HR may proceed with immediate termination. In such cases, the employee will not be entitled to any remuneration in lieu of notice.

3. PROTECTION AGAINST RETALIATION

Taskeen Health Initiative is committed to safeguarding individuals who report concerns in good faith. Retaliation against any person who raises a legitimate concern, cooperates in an investigation, or assists in enforcement of this policy is strictly prohibited. This includes, but is not limited to, dismissal, demotion, disciplinary action, threats, harassment, or any form of disadvantageous treatment as a consequence of whistleblowing.

Retaliatory acts are themselves considered serious violations of organizational policy and will be subject to disciplinary proceedings, which may include termination of employment or contractual relationships.

Furthermore, Taskeen will not tolerate any attempt to obstruct the reporting of misconduct. This includes discouraging individuals from reporting concerns, influencing their testimony, or taking punitive steps against them after a report has been made. Any such behavior will be thoroughly investigated and addressed with appropriate corrective measures.

Taskeen assures all whistleblowers that their rights to confidentiality, protection, and respectful treatment will be upheld throughout the process.

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4. CONFIDENTIALITY

All reports and investigations will be handled with the highest level of confidentiality. Information will only be shared with those directly responsible for investigating or resolving the concern. Disclosure may occur only where required by law.

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