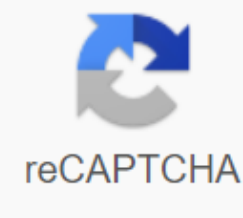




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## Whistle blowing policy and procedure pdf

The corporate whistle blow policy aims to provide a platform for whistleblowers to express their concern appropriately with pre-identified powers about any suspicious or undesirable events/activities that are against the policy of Allied Bank Limited or may have a negative impact on the business or goodwill of Allied Bank Limited or the public at large. Whistleblowers should be able to report such cases without any reservations of retribution, such as fear of job loss, discrimination, victimization, harassment, etc. Whistle Blowing is one of the effective modern management techniques used to prevent/detect probable attempts (s) to defraud an organization and other abuses by its employees, customers and/or other parties. It mobilizes staff to report their suspicions and reasonable doubts to management of malicious activities without fear or prejudice.

1. Introduction 1.1 The purpose of this policy is to create conditions in Allied Bank Limited (Bank) in which employees are encouraged to disclose and report without fear of retribution, subsequent discrimination and being at a disadvantage in any way, of any fraudulent, immoral, unethical or malicious activity or conduct that they believe may result in financial or reputational losses to the Bank. The corporate policy of blowing the bank provides safeguards for whistleblowers about secrecy and the protection of their legitimate personal interests. It also provides incentives for whistleblowers to report suspicious activity. The Bank's policy is to support and encourage its honest, dedicated and dedicated employees to report and disclose fraudulent, immoral, unethical or malicious acts and to investigate such reports. The Corporate Whistle Policy ensures that all reports under this policy remain strictly confidential and that the Bank is also committed to reviewing reports (if any) alleging acts of interference, retaliation, retaliation and threats against whistleblowers. The Bank's internal controls and operations are designed to identify and prevent or prevent such activities; however, even the best control systems could not provide absolute guarantees against violations. Therefore, all employees are advised to report any such activity or action/misconduct that may result in financial or reputational losses to the bank.

1.2 Definition of whistle blowing: Whistle blows is a message to the competent authority by an individual or institution to expose and/or inform about, alleged fraudulent, immoral, unethical or action, or discrimination, or some other type of adverse phenomenon that violates the law, regulation, policy, morality, and/or ethics and especially those issues that jeopardize the Bank's credibility and reputation as both trusted financial services provider. Corporate policy whistle blows: Corporate policy whistle blows is to induce whistleblowers to voice their concerns to the relevant pre-identified body about any fraudulent, immoral, unethical or malicious actions that are against the Bank's policies, or may have a negative impact on the bank's business or goodwill or society as a whole without any reservations of retribution, such as fear of job loss, discrimination, discrimination, discrimination, discrimination, , harassment, etc., Whistleblower: Whistleblower is a person or institution that blows the whistle and sends a message to the entrusted authorities, after the process, as prescribed, includes current or former bank employees, shareholders, suppliers, contractors, service providers, customers or the public. The role of the informant will be maintained only to the extent that he reports, who will not be considered an investigator and will not determine the appropriate remedial measures or remedial measures that may be required in this situation. Whistle-blowing group: An operationally independent team set up, overseen by ACOB, to process and monitor allegations, complaints and concerns raised by the whistleblower under the whistle blowing policy. Investigator: The chairman of ACOB should advise the whistle blowing complaint to the chief ARR or any other relevant executive bank or outsourcing to any investigator. The head of the ARR is conducting an investigation in accordance with the Bank's investigation procedure. If the complaint concerns the chief ARR, the person appointed by the Chairman of ACOB for the investigation may delegate the investigation to any person from the ARR or outsource it to any external agency. Good Faith: Good Faith is evident when the report is made, in the best interests of the Bank, without regard to personal gain and not on the basis of personal grievances and hostility, and the whistleblower has reasonable grounds to believe that the contents of the report are true. However, it is not necessarily that a report made in good faith turns out to be true. Misconduct: Examples of misconduct include, but are not limited to, financial fraud, violation of laws and regulations, violation of the Bank's policy, immoral or unethical conduct or malicious acts, negligence of debt and threats to the bank. Retribution: Retaliation means any act of discrimination, retaliation or harassment, directly or indirectly taken against the whistleblower by any person for disclosing information in accordance with this policy. Protection: Protection means all reasonable steps taken by the Bank to ensure the confidentiality of the whistleblower's name, as well as measures to protect the whistleblower from retaliation and financial losses.

1.3 Responsibility for the implementation of the Council's Audit Commission (ACOB) is responsible for implementing this policy. 1.4 Applicability The policy applies to all bank employees and external parties such as shareholders, suppliers, customers, etc. 1.5 Availability This policy should be available on the ABL SharePoint portal as well as on the ABL corporate website. 1.6 Guarantee the success of this Policy depends in part on the integrity, supervision and professional ethics of the whistleblower and respondent (s), as well as on the level of confidentiality retained. However, retribution from colleagues in the workplace and harassment or victimization by management are the main deterrents to whistle blowing. So to avoid the possibility of emotional, psychological and/or physical harm on the whistle blower resulting from the whistle blowing, the bank seeks to protect whistleblowers. 1.7 Privacy All matters will be dealt with with confidentiality and the identification of the whistleblower will not be disclosed, except in unavoidable situations where the disclosure of the identity of the whistleblower is important (e.g. his/her statement/evidence required in court) or the complaint report should be disclosed to those persons who need to know in order to properly investigate the complaint. 1.8 Review Chief ARR is responsible for keeping this document updated from time to time. Thus, this policy is subject to formal revision by the main ARR on a periodic (at least once every three years) basis, and proposals for any changes/changes/amendments to it should be submitted to the ACOP and its further recommendation to the IPC for approval. 1.9 Independence whistle blowing group 1. Under the supervision of ACOB, a whistle unit has been formed. The aim is to cover the 2.1 Goals outlined in this policy: to develop a culture of openness, accountability and integrity; provide an environment for honest, loyal, dedicated Bank employees to whistle when they know or suspect any immoral, unethical, fraudulent actions of any current or former employees, suppliers, contractors, service providers and customers who may cause financial or reputational risk to the Bank; To raise awareness among staff and

stakeholders regarding the function of the whistle blowing; and enable management to be informed early on about fraudulent, immoral, unethical or malicious activities or misconduct and take appropriate action. 2.2 The scope of this Policy includes, without restriction, the following: Unlawful actions or rulings requiring violations of the law, gross waste, mismanagement, abuse of power and resources of the Bank; Fraud is the deliberate act of one or more persons among management, persons accused of management, employees or third parties, including the use of deception Receiving an unfair or illegal advantage: Corruption - - Providing, receiving or extorting, directly or indirectly, anything of material value or providing undue benefit to improperly influence the actions of another person/employee; Misconduct - non-compliance with the Bank's employees' policies, rules and the Code of Personal and Professional Standards, including related to embezzlement and parallel banking; Conspiracy practice is an agreement between two or more persons/employees aimed at achieving the wrong goals, including improper influence on the actions of another person/employee; and any other activity that undermines the Bank's activities, reputation and mission. Claims relating to human resources and administrative matters are referred to the Director-General of the Bank for appropriate action in accordance with the Bank's policies and procedures related to this matter. This policy is not intended to call into question the financial or business decisions taken by the Bank and should not be used to review any other issues that have already been dealt with in accordance with other bank procedures, rules or regulations. 3. The protection of whistleblowers Provided information and the identity of the informant will be dealt with confidentially in accordance with section 1.7 of the policy. The bank is committed to protecting whistleblowers for whistle blowing, stalking or victimising the whistleblower will not be tolerated. If the informant believes that he/she may be the victim or harassed by the alleged officials after he whistles, the management may consider transferring him or her to another suitable location at his request. However, this guarantee does not apply in cases where it is proven that the whistleblower raised issues to settle his/her personal grievances or grievances or feuds or where the whistleblower was usually involved in complaining petty matters. The protection that the Bank may extend to the Whistleblower is limited to the Bank's capabilities, but any response to any whistleblower as a result of the whistle blown by such a person under this policy is considered to be misconduct and subject to disciplinary action. Disciplinary action will be granted to the whistleblower officer, in respect of the actions/participation in the activities against which the whistle is blown, based on the substance of the subject matter, 4. Responsibilities 4.1 The Bank's responsibilities will spread the corporate policy of whistle blowing for the information of all bank employees. The Bank will establish the following channels of communication to file complaints about whistling: a special email address for Whistle Blowing (e-mail is protected) will be available to the Chairman of ACOB. Whistle blowing forms are available on the bank's corporate website. Mail / courier addressed ACOB, Allied Bank Limited, head office, 3-4 Tipu Block, New Garden Town, Lahore. Where the Whistleblower sends messages to the postal address given in this Policy, the Bank ensures that unfiltered complaints are delivered directly to the ACOB Chairman. The bank set up a mechanism to assess the effectiveness of the whistle function blowing under this policy. Under this mechanism, IIA's issues raised under whistle blow mechanisms and management responses to such questions will be periodically inspected by THE ACOB. In addition to this, the names of the official (s) responsible for receiving, processing and monitoring complaints of whistling blow should be submitted to the ACOB for periodic review. The bank will ensure fair and consistent compliance with the corporate policy regarding the whistle. It should stipulate zero tolerance for all violations, such as fraudulent, immoral, unethical or malicious activities. The bank will ensure that the whistleblower feels safe by reporting fraudulent, immoral, unethical or malicious acts. Whistleblowers should share their identity by enabling the Bank to provide protection under section 3 of this policy and, if necessary, share the results of the investigation. 4.2 The responsibility of whistleblowers in the event that any fraud, forgery, fraud, immoral, unethical or malicious acts took place in connection with the participation of Bank officials, employees who have knowledge, ethically and morally obliged to whistle or take appropriate action if they are authorized. The whistleblower is expected to remain impartial in reporting on matters relating to this policy. When disclosing information, the whistleblower should exercise due care to ensure the accuracy of the information. A whistleblower should not make repeated, malicious, wrong, non-fact-based statements based on personal grievances, grievances or personal animosity or vexing statements. In this case, appropriate action may be taken against the Whistleblower. 5. Incentives for exposing to motivate Bank employees to behave honestly, in loyalty to the Bank, regardless of fear, to save the Bank from the risks of financial or reputational losses caused by fraudulent, immoral, unethical or malicious activity or misconduct of certain dishonest and corrupt persons, management can offer incentives. In order to be entitled to all such incentives, the informant must share his contact information. In the event of an anonymous whistle blow, such remuneration is not given to anyone in any situation or circumstance, even if the charges have proved to be true. On the recommendation of the ACOB management, the whistleblower who brings to the notice or reports any fraudulent, immoral, unethical or malicious activity that may result in financial or reputational losses or legal threats to the bank, the bank, be properly rewarded according to the value of the information he/she has provided and the consequences of the losses prevented as a result. The award may include cash prizes and or an increase in salary and promotion. Prizes/awards will be awarded to the concerned whistleblower confidentially and in a way that no one can understand the actual reason for this. 6. The abuse of whistling is expected to prevent all staff from inciting rumours, irresponsible behaviour and false allegations, and if staff members make a statement in good faith but this is not corroborated by the investigation, no action will be taken against them. If, however, employees make malicious or unsubstantiated accusations/complaints (s) or the wrong whistle blowing policy for improperly posting/transferring themselves to disclosing to a team member/senior about a whistle blown or shelter available under whistle blowing policies, action may be taken against them after a proper investigation. 7. Implementation of the corporate whistle blow policy 7.1 The Whistle Blowing Process of the chief ARR is responsible for the design of the Whistle Blowing Procedures Guide, which must be approved by the ACOB. 7.2 Strict confidentiality will be exercised in reporting on the investigation. The report, together with the results of the investigation conducted by the formed group, is periodically submitted to the Chairman of the ACT. 7.3 Keeping the Whistle blowing complaint All whistle blowing complaints received at the aforementioned dedicated email address, mailed or through a whistle blowing form available on the ABL corporate website must be retained for 3 years, after which the complaints must be archived and retained in accordance with the bank's record retention policy. 7.4 Disciplinary measures If the involvement of Bank officials in fraudulent, immoral, unethical or malicious activities and other abuses is proven during the investigation of the case, the disciplinary measures will be initiated in accordance with the applicable rules and procedures of the Bank. For external parties, the Bank may, on the basis of an investigation report and recommendations, consider taking appropriate legal action against the party concerned. If the case is serious, the Bank may decide to take legal action against the culprit (s), culprit (s). whistleblowing policy and procedure. whistleblowing policy and procedure nursery. whistleblowing policy and procedure in malaysia. whistleblowing policy and procedure in schools. whistleblowing policy and procedure nz. whistleblowing policy and procedure in banks. whistleblowing policy and procedure in childcare. whistle blowing policy and procedure pdf

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