
WHISTLE BLOWING PROGRAMM

INTRODUCTION -

Silkbank is committed to high standards of ethical, moral, and legal business conduct. Our success as a financial organization is based on integrity, honesty, and trust in everything we do. In line with these standards, and our commitment to open communication, the whistle blowing program provides an avenue to raise concerns.

We encourage all employees at Silkbank, and outside parties such as Shareholders, Vendors, Customers, etc. to report their concerns against irregularities, financial malpractice, fraud and forgeries, personnel harassment, improper conduct, or any wrongdoing without fear of reprisal, adverse consequences, and or retribution. We assure the whistle blower that they will be protected from victimization.

Whistleblowing:

- **Dictionary meaning**-Raising voice against or highlighting an unusual issue/event/problem/ incident/fact through written or verbal communication.
- **Corporate meaning**-The disclosure/indication/intimation of whistleblowing event/activity by stakeholders through written or verbal communication to the entity.
- **Whistleblowing Activity/Event/Practice** -Whistleblowing activity / event / practice shall include any of the following which undermines the bank's operation, financial position, reputation, and mission;
 - Irregularity
 - Financial malpractice
 - Fraud & forgery
 - Personnel harassment
 - Improper conduct or wrong doing
 - Bribery
 - Violations of any other laws, regulations or Silkbank policies
 - Any other unusual activity or transactions or sequence of activities or transactions

Scope and Rationale:

- a. In order to achieve the objectives of the Whistleblowing Program, bank staff as well as outside parties including shareholders, vendors, customers, etc. may report their concerns to the whistleblowing committee.
- b. The rationale of implementing Whistleblowing Program, in addition to complying with SBP requirement, is to provide a mechanism to Bank's Shareholders, Employees, Customers, Vendors, etc. to report any activity which in their opinion may cause financial or reputational loss to the bank. Thus, the objectives of the program include;
 - To provide an environment whereby stakeholders feel confident to blow the whistle without any fear of reprisal, subsequent discrimination, and of being disadvantaged in any way.
 - To develop a culture of accountability and integrity.
 - To create awareness amongst stakeholders regarding the whistle blowing functions and
 - To be a source of early warning signal.
- c. This program has not been designed to question financial or business decisions taken by the Bank nor should it be used to reconsider any matters which have already been suitably

addressed under harassment, complaint, disciplinary or other procedures.

Further, personal grievances and complaints should not be raised under Whistleblowing Policy. Employees should take up such matters under the appropriate policy i.e. Grievance Policy. Customers/third part can file a complaint through call center or online form (www.silkfeedback.com.pk/csms/)

- a. External parties related matters shall be first investigated internally and based on legal opinion (where required) the Bank shall consider legal actions to be taken and/or referral to concerned regulatory authorities/investigation agencies.

Communication Channels for Lodging Complaints

Stakeholder shall raise his/her concern using any of the following channels for whistle blowing:

- **Hot line:** +92-21-111-00-7455 (Ext. 275 & 666)
- **Email:** whistle.blowing@silkbank.com.pk,
- **Postal Mail:** Whistle Blowing Complaints, Silkbank, Audit Division, Cavalry Branch, 20-Commerical Area, Cavalry Ground, Lahore. All such mails should be marked "confidential" on the outer envelope and "whistle blowing" on the inside envelope for maximum confidentiality.
- Whistle Blowing Form -Stakeholders also have the option to submit their concern by completing the "Whistle Blowing Form" available on Silkbank Corporate website.

Whistle-blowers shall share their identity enabling Bank to provide protection as provided in this policy under section 'Whistle Blower Protection' and share the results of investigation, if required.

Authorized representative to receive Whistle Blowing Complaints

- Chairman Whistle Blowing Committee (Group Head Legal & Compliance), Head of Human Resources, and Head of Internal Audit. Further, **Email:** whistle.blowing@silkbank.com.pk will also be accessible by the Chairman Board Audit Committee.
 - Whistle Blowing Complaints, relating to Board Member, President & Chief Executive Officer, employees of Internal Audit, Business Risk Review and Compliance groups, may also be logged directly to the Board Audit Committee at email ID BAC@silkbank.com.pk
- b. The complaint/concern shall include:
- Purpose clearly mentioned
 - Issue properly identified
 - Signed and dated
 - Clear identity of the complainant such as name, address, designation, email, Cell Number, etc. (Attached whistle blowing complaint form may be used, Annexure- A)
- c. Management shall ensure confidentiality of the complaint and security of the whistle blower from any adverse reaction that may erupt due to the complaint. On Committee's recommendation to CEO the whistle blower may be rewarded, on highlighting any issue that results in monetary benefit to the bank in terms of cost saving, operational efficiency compliance with the regulatory requirement, etc.
- d. In case the Committee is of the view that deliberate false complaint/concern was raised by the whistle blower for personal or other reasons, disciplinary action against him/her may be considered.

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Annexure A Whistle Blowing Concern/Complaint Form**Details of Complainant**

Name	Address	CNIC	Designation (In case of employee)
E-Mail	Cell/Contact No.	Signature	Dated

Subject**Detail of Whistle Blowing Activity****Note:**

- Please use additional sheets and attach documents if required
- Email id for whistle blowing complaint is; whistle.blowing@silkbank.com.pk
- Please drop this complain in the complaint box after enclosing the same in the envelop marked to Whistle Blowing Complaints, Silkbank, Silkbank, Audit Division, Cavalry Branch, 20-Commerical Area, Cavalry Ground, Lahore.