

RSPN's Whistle Blowing Policy - Section 2.23 of RSPN HR Policies and Procedures Manual

RSPN's Whistle Blowing Policy:

- a) RSPN conducts its affairs in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour. RSPN's internal control and operating procedures are intended to detect and to prevent or deter improper activities. However, even the best systems of controls cannot provide absolute safeguards against irregularities. RSPN's Whistle Blowing Policy addresses the commitment of RSPN to integrity and ethical behaviour by helping to foster and maintain an environment where employees can act appropriately, without fear of retaliation.

To maintain these standards, RSPN encourages its employees and others who have concerns about suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the organisation, to come forward and express these concerns without fear of punishment or unfair treatment.

RSPN shall thoroughly investigate whistle blowing reports/disclosures and address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion or intimidation against employees who report, disclose or investigate improper or illegal activities. All such reports shall be treated as strictly confidential. Employees and others are encouraged to use guidance provided by this policy for reporting all allegations of suspected misconduct or improper activities.

This policy presumes that employees will act in good faith and will not make false accusations when reporting misconduct by the organisation's employees. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary procedures.

Examples of whistle blowing acts:

- Conduct, which is an offence or a breach of Pakistani laws;
- Conduct, which is not part of RSPN's charter;
- Unauthorized sharing of RSPN or donor's data with third parties or persons;
- Unauthorized use of RSPN's resources for personal gains;
- Favoritism/Nepotism for awarding jobs, contracts or related information;
- Physical, sexual or other abuse of employees or others;
- Any other unethical behavior or conduct.

b) Procedure for reporting allegations of misconduct or improper activities:

- 1 The following committee at RSPN shall investigate/address the issues raised by whistle blowers:

i)	Chief Operating Officer	Chair
ii)	Chief Financial Officer	Member
iii)	Manager HR & Administration	Member
iv)	Manager Gender & Development	Member

At least one member shall be a woman.

- 2 Whistle blower may report his/her concern to any of the members of the above committee.
- 3 In case of a concern against CEO RSPN or any of the above committee members, the concern shall be reported to the Audit Committee of the BOD of RSPN.
- 4 Whistle blower may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the organisation, its stakeholders, employees, or the public at large.

- 4 Acts of misconduct shall be disclosed in writing, so as to assure a clear understanding of
the issues raised.
- 5 Whistle blowers are recommended to self-identify, though it is not a requirement of the
policy.
- 6 Although the whistleblower is not expected to prove the truth of an allegation, s/he needs
to demonstrate to the committee that there are sufficient grounds for the concern.

c) Investigation of alleged misconduct or improper activities:

- 1 The Whistleblowing Investigation Committee member who receives a report shall call the
meeting of committee within three (03) working days of the receipt of report, to discuss
about the action / investigation on the report received from whistleblower.
- 2 Concerns about allegations which fall within the scope of other committees of RSPN shall
be referred for consideration by that committee.
- 3 The committee shall conduct investigations in a thorough manner. The committee shall be
authorized with access to all sorts of documents and concerned parties that will help them
to carry out an independent investigation.
- 4 The committee shall ensure that investigations are carried out using appropriate channels,
resources and expertise.
- 5 The committee shall report its findings and recommendations to CEO RSPN.
- 6 CEO RSPN reserves the right to make any decision based on the findings and
recommendations made by the Whistleblowing Investigation Committee. The decision of
CEO RSPN shall be considered final.