



WHISTLEBLOWING POLICY

PURPOSE:

Pharmagen is committed to conduct its business with honesty, dignity and integrity and we expect the same from our employees to maintain those standards.

Pharmagen provides a platform to its employees to communicate any suspected wrong doing, malicious activities or any other type of adverse occurrence that are against the regulations without any fear of reprisal.

SCOPE:

This policy shall be applicable to all employees of Pharmagen, sister concerns, shareholders, suppliers or customers without any discrimination.

WHISTLEBLOWING:

Whistleblowing is a communication or disclosure of information regarding any suspected wrongdoings within the company which may include:

- Alleged fraudulent activities
- Malicious practices such as immoral, illegal or unethical business conduct
- Damage to the environment or/ or putting someone's health or safety in danger
- Breach of company's code of conduct and confidentiality policy
- Deliberate concealment of information which may have an adverse effect on Company's Goodwill and business

HOW TO RAISE A CONCERN:

Company will circulate this policy at all levels and for staff employees it will be translated into Urdu language for their better understanding. To report any occurrence the following procedure will be followed:

- An employee may communicate his/her concern by using:
Email address (whistleblowing@pharmagen.com.pk)
Courier Whistleblowing form directly to Head Office addressing Executive Director/Managing Director at 5A, Zafar Ali Road, Gulberg V, Lahore
- Management will evaluate each concern/complaint and will take necessary action to investigate the matter.
- Management will get in touch with the employee to discuss his/her concern in detail.
- Employee will treat all information during investigation as confidential.
- Management will deal all concerns fairly and in an appropriate manner with zero tolerance against all violations and will close the matter, accordingly.



- If the allegation is proved during investigation, disciplinary action will be initiated as per the applicable rules and procedure of the company. If the matter involves any financial corruption and/or damage to company's goodwill, company may decide to take legal action against the culprit.

CONFIDENTIALITY:

All whistleblowing disclosures will be treated as confidential. We do not encourage employees to raise their concern anonymously that may interrupt investigation procedure in case where more information required. However, company will take appropriate measures to protect whistleblower's identity.

MISUSE OF POLICY:

It is expected from all employees to be responsible while initiating any allegation/concern. If an employee suspects any wrongdoing and makes an allegation or report in good faith of the company which proved to be a mistake upon investigation, no action will be taken against him/her. However, In case where an allegation is made in response to any retaliation/revenge, action will be taken against that employee after proper investigation.

RETENTION OF COMPLAINTS:

All received complaints with their proper record will be retained maximum upto three years after which the complaints shall be archived.

This policy shall be reviewed after every three years.

Prepared by:

Reviewed by:

Approved by:

HR Manager

Executive Director

Managing Director