

Whistle-Blowing Policy

Overview and Purpose

Pakistan Refinery Limited (PRL) is committed to upholding the highest standards of governance and business conduct. Our Whistle-Blowing Policy (the "Policy") is designed to identify and address any suspected or actual wrongdoing, impropriety, or malpractice within the company. Employees are encouraged to report any genuine concerns responsibly and effectively, without fear of victimization or discrimination.

By establishing this Policy, PRL aims to:

- Foster a workplace where no wrongdoing or impropriety is acceptable.
- Encourage employees to share information about any suspected wrongdoing.
- Protect employees who disclose perceived wrongdoing in good faith from any retaliation.
- Ensure a fair and impartial investigative process.
- Take necessary actions when required.

Scope

This Policy applies to all PRL employees, across all business lines, whether temporary or permanent, as well as suppliers, customers, service providers, contractors, consultants, and their staff. It covers the reporting of suspected or actual wrongdoing or impropriety that could harm PRL's reputation or work environment. Examples include:

1. Fraud or money laundering
2. Corruption, misappropriation of funds, or financial embezzlement
3. Offering or accepting bribes
4. Unethical or illegal acts (e.g., theft, violence, criminal activity)
5. Non-compliance with laws, rules, or regulations
6. Actions that damage PRL's assets or reputation

Key Definitions

- **Whistle-Blower:** An individual who reports an allegation of wrongdoing, impropriety, or irregularity within PRL that has not been resolved to their satisfaction. This includes PRL employees, suppliers, customers, and service providers.
- **Target:** The person(s) potentially implicated in the Whistle-Blower's allegation.
- **Compliance Officer:** The Chief Internal Auditor of PRL.
- **Competent Authority:** The Chairman of the Board Audit & Risk Committee.
- **Manager:** The immediate supervisor or Head of Department responsible for overseeing a section or department within PRL.

Roles and Responsibilities

- **Employees' Responsibilities:** Employees suspecting wrongdoing by their colleagues should report it immediately using the contact options provided in this Policy. Reports can be made via:
 - **Drop Box:** Whistle-Blower Complaints, Head Office (Reception), Pakistan Refinery Limited, P.O. Box 4612, Karachi – 75190
 - **Email:** whistleblower@prl.com.pk
- **Managers' Responsibilities:** Managers must emphasize integrity as a standard of performance. They must report any complaints they receive to the Compliance Officer immediately. The Compliance Officer will consult with the Managing Director & CEO and report the matter to the Competent Authority for advice.

Complaint Handling Process

Once aware of an issue, a Whistle-Blower should report it to any of the following:

1. Manager
2. Compliance Officer
3. Managing Director & CEO

Managers must immediately inform the Compliance Officer of any complaints. The Compliance Officer will evaluate the complaint and consult with the Managing Director & CEO, who will take necessary actions and report to the Competent Authority. The Competent Authority will review and advise on the complaint, including initiating an investigation if required.

If the complaint involves the Compliance Officer or the Managing Director & CEO, it should be reported directly to the Competent Authority. During investigations, precautions are taken to avoid unfounded accusations. If the Target is found guilty, they will be dealt with according to PRL's policies.

In cases of anonymous complaints, the Compliance Officer will assess the complaint's merits and consult with the Managing Director & CEO. Serious complaints will be reported to the Competent Authority for further action.



Identity of Whistle-Blower

In extreme cases, a Whistle-Blower may request that their identity be kept confidential to protect themselves or the company's interests.

Action Against Misuse of Policy

No adverse action will be taken against a Whistle-Blower for reporting a matter in good faith. However, any false or fabricated allegations will be considered misuse of the whistle-blowing process and will be addressed accordingly.

For detailed information, please refer to the attached Whistle-Blowing Policy document or contact our Compliance Officer at **whistleblower@prl.com.pk**.