

WHISTLEBLOWING POLICY & PROGRAM

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1. INTRODUCTION

HBL endeavours to achieve a transparent culture and maintain highest ethical standards in all its practices. HBL promotes a workplace culture where employees feel safe in sharing their ideas, views and concerns, reporting misconduct and potential ethics violations.

Our practices are defined by HBL values of Integrity, Customer Centricity, Value People, Progressive and Excellence, and these values drive behaviours for all staff. HBL's Code of Conduct also emphasises that all bank staff are to conduct business of the bank in full compliance with applicable laws, rules and regulations and to adhere to the highest ethical standards.

HBL has standard operating procedures and escalation mechanisms in place where issues and concerns can be raised routinely with the line management or to relevant authorities. To further support its commitment of providing safe environment for sharing concerns, reporting misconduct and potential code of conduct violations, HBL has laid out the whistleblowing policy and program.

The Whistleblowing Program encourages all stakeholders to be vigilant, transparent and courageous to raise their concerns responsibly by blowing the whistle to the relevant authorities so that appropriate remedial action is taken in a timely manner.

2. SCOPE & PURPOSE

HBL's Whistleblowing Policy & Program have been framed in accordance with the SBP C3 Annexure 1 (Section on Whistle Blow Policy) Instructions on Fraud Risk Management for Banks/ MFBs/ DFIs.

This Whistleblowing Program is applicable to all domestic and international locations, all bank staff (permanent, post retirement contracts, contractual and/or outsourced resources, interns and ex-employees), customers & all stakeholders including directors, suppliers, vendors, contractors, consultants, service providers, shareholders or any other representative of the bank. The Whistleblowing Program will be applied to international locations in line with Policy Framework AFPAD (Approval framework for Policies & Associated Document)

The purpose of Whistleblowing Program is to encourage bank staff to feel confident in blowing the whistle in good faith with adequate protection measures in place. Bank staff who has observed an actual or suspected reportable misconduct have an obligation and responsibility to report such conduct to relevant authorities.

This program is not applicable to the issues related to bank staff's personal grievances related to performance appraisal, promotions, bank provided benefits, compensation or other HR related matters, which should be reported to Human Resources.

This document shall be available on intranet portal and extract thereof on HBL's website for reference of all stakeholders.

3. DEFINITION

3.1 Whistleblowing

The term Whistleblowing refers to an act of raising concerns about actual or potential violations of the law, HBL policies and procedures, and HBL's Code of Conduct that may lead to financial, regulatory or reputational implications for the bank.

These include but are not limited to misconduct, unethical behaviour, fraud & forgery, financial malpractices, bribery, corruption, money laundering, terrorist financing, insider trading, password sharing, alleged dishonesty, danger to health & safety, bullying, personal harassment including sexual harassment, discrimination, regulatory misreporting, questionable accounting, auditing and financial reporting practices, social & environmental risks, breach of law, unauthorized use or illegal activity.

3.2 Whistle Blower

Whistle blower includes anyone who has lodge a complaint or concern through the whistle blowing channels pertaining to an actual or potential violation of the law, HBL policies and procedures or Code of Conduct.

3.3 Whistle Blow Unit

Ethics & Conduct team, under supervision of Ethics and Conduct Officer within Global Compliance & Conduct handles and monitors allegations, complaints, and concerns raised by whistle blowers under the Whistleblowing Program.

3.4 Relevant Authorities

This can include supervisor, or one level above supervisor of the Whistle blower, Whistle Blow Unit, Chief Human Resource Officer (CHRO), Chief Compliance Officer (CCO) and Chief Internal Auditor (CIA), Regional General Manager or Country Manager in case of international operations.

4. PROTECTION

The Bank will safeguard the confidentiality of the Whistle blower's name including protection of the Whistle blower for reporting misconduct or irregularities in good faith, without any fear of reprisals, victimization or adverse consequences. No retaliatory action will be taken against whistle blowers and their performance evaluation, compensation or any rewards related assessment will be in line with relevant HR policies.

There is no tolerance for victimization and harassment of Whistle blowers. Any such act will be treated as gross misconduct which if proven, may result in disciplinary and/or other legal actions

as deemed appropriate against the person involved. Any allegations of victimization or detriment arising from whistle blow complaint, will be treated as Whistle blow and shall be managed in accordance with this program.

5. CONFIDENTIALITY

Confidentiality of the Whistle blower's identity, the nature of the complaint and the suspected person's identity must be maintained within the limitations of law, this policy and legitimate needs of the investigation. Where an investigation cannot proceed without disclosing identity of the whistle blower, their prior written consent will have to be obtained. If they do not want their identity to be disclosed, then the investigation will continue as best as possible within given limitation.

Whistle blowers are encouraged to put their names to allegations and concerns raised in order to facilitate follow-up questions and investigation which is the preferred mode of reporting. Only those anonymous complaints where either material evidences are provided, or as deemed appropriate and necessary by Whistle Blow Unit, shall be considered for initiating an investigation.

6. INCENTIVES

Identifiable whistle blowers may be incentivised in the form of non-monetary recognition such as certificates. Any incentive given to the concerned whistle blower will be in a manner which will maintain confidentiality of the subject matter of the complaint.

7. DISCIPLINARY ACTION

Where a whistle blowing complaint is substantiated or where any act of retaliation or victimization exhibited / proved against a whistle blower appropriate disciplinary action in line with HR's Policies will be taken against the responsible individual(s). Any appeal against disciplinary action taken will be as per relevant HR Policy.

8. MISUSE OF PROGRAM

Misuse use of the Whistleblowing Program shall not be tolerated. Whistle blowers who knowingly report false or misleading information shall not be protected and bank staff would be liable for disciplinary actions. In case reported information proves to be a deliberate attempt to abuse and/or using this Whistleblowing channel to settle personal grudges, illicitly avail rewards or defame other stakeholders; strict disciplinary action will be taken against such bank staff in accordance with the HR policies of the Bank.

9. REPORTING REQUIREMENTS

Ethics & Conduct team is responsible for managing and implementing the Whistleblowing Program which is subject to independent review by Board Compliance & Conduct (BCNC) Committee.

On a periodic basis, or as deemed necessary by the Ethics and Conduct Officer, matters arising out of the Whistleblowing complaints be shared with the BCNC.

10. RECORD RETENTION

All Whistleblowing complaints received at dedicated email address i.e., whistle.blow@hbl.com, or via mail, or on hotline or through Whistleblowing Form which is available at HBL's website shall be retained for last 10 years.

11. REVIEW AND UPDATE OF PROGRAM

The program is subject to review at least once in three years or earlier (if required) by Whistle Blow Unit. All amendments and updates to the program shall be approved by BOD.

ANNEXURE I

PROCEDURAL GUIDELINES

Below given are the procedural guidelines which shall be followed for the governance and monitoring of effective implementation of Whistleblowing Program, this also includes the escalation and investigation of Whistleblowing complaints.

The procedure allocates responsibilities to the stakeholders in order to ensure that Whistleblowing Program is effective, independent, trustworthy and responsive.

RESPONSIBILITY OF STAKEHOLDERS

- I. Every staff of the Bank, irrespective of their role, designation and nature of assignment, are ethically and morally bound to promptly inform the management about any suspicious activities, transactions or criminal offence which comes to their knowledge, that may entail infringement of Bank's policies, fraud & forgeries and other malpractices, exposing the Bank to financial losses and potential reputational and/or legal risk.
- II. Staff shall also be responsible to extend full support and cooperate in investigations of the reported incidents.
- III. Whistle blower should not communicate wrong, non-factual, allegation based on personal grudges, grievances. In case the matter is reported with a mala fide intention, appropriate action may be taken against the whistle blower.
- IV. Bank staff are encouraged to disclose their identity with the personnel handling the whistle blow for better follow-up. Only those anonymous complaints will be considered for initiating initial inquiry / investigation which are in accordance of requirement of the Whistleblowing Program.
- V. In case whistle blow complaint is received by any stakeholders, then it will be their responsibility to immediately bring it to knowledge of Whistle Blow Unit.
- VI. Every staff is responsible to attain mandatory e-learning training on Whistleblowing Program to make them aware of their rights and obligations on the matter and the channels through which they can blow the whistle.

Communication Channels for lodging complaints

Whistle blowers should raise their concern using any of the following communication channels of Whistleblowing.

- I. **Hot line** - Whistle blowers may use a dedicated call number +92-21-111-333-425 with an option whether to lodge complaint directly or speak to designated Whistle Blow representative. The hotline would be functional 24 hours and 7 days. If the informant wants to speak to Whistle Blow Unit representative as direct contact, this shall only be facilitated during office hours: Monday to Thursday 9: 00a.m to 5: 30p.m and Friday 9: 00a.m to 6:00am (Pakistan Standard Time). All complaints received at hotline will be automatically recorded. Both Chief Internal Audit, Chief Compliance Officer and Chief Human Resource Officer will have the access to these recordings.
- II. **Email** - Whistle blowers may report matters to Ethics & Conduct through a dedicated email address whistle.blow@hbl.com.
- III. **Postal Mail Service**- Whistle blowers may report such matters to relevant authorities through Postal -mail service, with direct address made to the Chief Compliance Officer in copy with Chief Human Resource Officer and Chief Internal Auditor at following addresses:
 - Ethics & Conduct Officer, 32nd floor, SKY Towers, East Zone, Block 4, Clifton, Karachi, Pakistan
 - Chief Compliance Officer, 32nd floor, SKY Towers, East Zone, Block 4, Clifton, Karachi, Pakistan
 - Chief Human Resource Officer 31st floor, SKY Towers, East Zone, Block 4, Clifton, Karachi, Pakistan
 - Chief Internal Auditor 13th floor, HBL Plaza, I. I. Chundrigar Road, Karachi, Pakistan

All such mails should be marked as "confidential" on the outer envelope and "Whistleblowing" on the inside envelope for maximum confidentiality.
- IV. **Website Form** – Whistle blowers may report such matters through whistle blows form available at HBL's website. (Ref. to Annexure III).
- V. **For International Operations** - the stakeholders from international locations may report their concerns to relevant Country Manager or Regional General Manager (RGM), who would then be responsible to bring it to the knowledge of CCO & CHRO HO in line with the above procedures.

For HR related Grievance - personal grievances related to performance appraisal, promotions, bank's provided benefits, compensation, disciplinary concerns, job posting & transfers, etc. should be reported via hr.help@hbl.com or speakup.hr@hbl.com. Any such complaints received on Whistleblowing channel will be forwarded to speakup.hr@hbl.com.

Whistle blow Complaint Handling Procedure

The purpose of complaint handling procedure is to make it easier for whistle blowers to report irregularities in good faith and without having fear of adverse impact. Below procedure shall be followed

- I. Whistle Blow Unit in Ethics and Conduct shall maintain a log (As mentioned in Annexure IV) of all such matters being reported through different channels, ensure that case number is assigned to each and every complaint and also conveyed (as & when required) to whistle blower within two working days, in cases where identity is disclosed.
- II. Once the complaint is received in Whistle Blow Unit, the designated officer of Whistle Blow Unit would perform the initial review of the complaint to ascertain if the complaint should be handled under Whistleblowing Program. The cases related to individual's personal grievances related to performance appraisal, promotions, bank provided benefits, compensation, discipline & concerns related to job posting, etc. are not dealt under Whistleblowing Program and is reported to Human Resources. Calls received at whistle blow hotline are auto recorded which can be accessed by Whistle Blow unit as & when required. All whistle blows received through the Whistleblowing dedicated e-mail are auto forwarded to Whistle Blow unit.
- III. If the Complaint falls under Whistleblowing Program, then according to the nature of concern, the designated Whistle Blow Officer will forward the case to respective units i.e., Internal Audit, Fraud Risk Management Unit, Human Resource, **Complaint Resolution Unit or other relevant stakeholder** for initial scrutiny of the case. If the Complaint does not fall under Whistleblowing Program, whistle blow unit will be forwarded to the point of contact of the relevant department for review in light of their respective approved procedures.
- IV. The designated officer of Internal Audit, Fraud Risk Management Unit or Human Resource may directly contact the whistle blower (if required) after the consent has been received from whistle blower. At this stage, the whistle blower shall be assured that they will be protected from possible victimization, shall be asked if they want their confidentiality to be maintained and /or want to make a written or verbal statement. In either case, the designated officer will write a brief summary of the interview.
- V. In case the Whistleblowing is against the President, any staff of Internal Audit Group, Global Compliance & Conduct Group, Human Resources or board member(s), the complaint may be made to the Chairman Board Audit Committee at email address whistleblow.BAC@hbl.com.
- VI. All the investigation must be completed within thirty working days from the date of concern raised and report should be submitted along with the recommended action.

- VII. The designated officer of Whistle Blow Unit shall follow up from relevant units for timely closure of the complaint and ensure that the complaint is closed based on relevant investigation/fact finding / preliminary assessments and appropriate DA.
- VIII. The finding of investigation will be communicated by investigating unit to Human Resources and Whistle Blow Unit. The decision taken on the matters as per Disciplinary Action Policy shall be shared by Head Employee Relations, HR with Whistle Blow Unit.
- IX. The designated officer of Whistle Blow Unit shall give feedback of the investigation to the whistle blower. This would not include details of any disciplinary action, which shall remain confidential.

ANNEXURE II

Roles & Responsibilities

ROLES	RESPONSIBILITIES
Whistle blowers	<ul style="list-style-type: none"> • Immediately inform Whistle Blow Unit about any serious concern, suspicious activity, transactions criminal offence or any irregularity that comes to their knowledge / brought to his / her attention. • Extend full support and cooperate in investigation in order to facilitate follow-up questions and investigation. • Remain unbiased and exercise due care to ensure the accuracy of the information while reporting. • Maintain confidentiality of information. • Should not communicate wrong, non-factual, allegation based on personal grudges and grievances. • Attain mandatory e-learning Whistleblowing training, if they are bank staff.
Ethics and Conduct – Whistle Blow Unit	<ul style="list-style-type: none"> • Manage the implementation of the Whistleblowing Program. • Manage the mechanism of the program. • Follow up from relevant units for timely closure of the complaint within defined TAT. • Overall management of the dedicated hotline line, email, website form. • Maintain and manage complaint logs & centralized database of whistle blow complaints. • Recommend cases to Human Resource for consideration of incentives on a case-to-case basis. • Create awareness by providing training and conducting campaigns (where necessary) on Whistleblowing Program.
Human Resource	<ul style="list-style-type: none"> • Manage Disciplinary action proceedings as recommended in the investigation report(s). • Ensure that reported matters related to HR are thoroughly investigated. • Provide incentive to whistle blower based on recommendation from Ethics and Conduct as per bank’s policy. Ethics and Conduct will only recommend the name of whistle blower; the incentive will be decided by Human Resource. • Share summary of all complaints received and handle directly related to personal harassment, discrimination to Whistle Blow Unit-Ethics and Conduct on a monthly basis to facilitate and ensure that all Whistleblowing complaints are logged at a centralized place and also consolidated report is made. The summary should, at the minimum, include date of complaint, brief nature of complaint status of investigation whether in process or closed, ageing of complaint etc.
Information Technology	<ul style="list-style-type: none"> • Responsible to provide adequate infrastructure and technical management of the helpline, email and website form.
Internal Audit	<ul style="list-style-type: none"> • Conduct periodic review of the program based on Internal Audit Policy requirement. • Ensure that reported matters are thoroughly investigated when complaints are referred.
Legal	<ul style="list-style-type: none"> • Providing advice and assistance to Whistle blow complaints on case-by-case basis.
Fraud Risk Management Unit	<ul style="list-style-type: none"> • Ensure that reported matters are thoroughly investigated with respect to Consumer loans, Credit card, Debit card & Alternate Delivery Channels. • Ensure reporting of all fraud cases to SBP as per Anti-Fraud Policy.
Complaint Resolution Unit	<ul style="list-style-type: none"> • Communicate all complaints that fall under whistle blow purview to whistle blow unit.

ANNEXURE III

Whistleblowing Form

1. Title

- Mr.
- Ms.
- Other (Please, specify)

2. Is the person submitting the complaint an/a:

- Employee
- Customer
- Vendor
- Other (Please, specify)

3. First Name

4. Last Name

5. CNIC Number

6. Phone Number

7. Cell Number

8. Email Address

9. Mailing Address

10. Please, provide details with respect to the location of the incident

11. Please, describe nature of concern

12. Please, provide full name(s) and / or title(s) of individuals whom you suspect of wrongdoing

13. Please, provide evidence if any

14. Would you like to arrange a meeting / telephone call with our representative to discuss your concern raised?

Yes

No

15. Any other comments or additional information would you like to share?

ANNEXURE V

Whistleblowing FAQ's

FAQ's (Frequently Asked Questions)

i. What is the Whistleblowing Program?

Whistleblowing Program encourages stakeholders to use the guidance provided in the program to "blow the whistle" about "illicit, illegal, unethical or immoral practices" and provide a procedure for filing and addressing whistle-blower matters.

ii. What is Whistleblowing?

The term Whistleblowing refers to an act of raising concerns about actual or potential violation of the code of ethics & business conduct and may include but not limited to misconduct, unethical behaviour, fraud/ forgery, bribery, corruption, money laundering, terrorist financing, insider trading, password sharing, alleged dishonesty, danger to health & safety, bullying, personal harassment including sexual harassment, discrimination, regulatory misreporting, questionable accounting practices, auditing and financial reporting practices, breach of law, unauthorized use of bank's property, unethical / unfair practices improper conduct or wrong doing or illegal activity occurring within the bank that may lead to financial, regulatory or reputational loss.

iii. What is the difference between anonymity and confidentiality?

A whistle blower raises a concern confidentially if he or she gives his or her name only on condition that it is not revealed without their consent. If the Bank is bound to disclose it under the law, then in that case consent from the whistle blower would not be required. An employee or any other whistle blower raises a concern anonymously if they do not give their name. Usually, the best way to raise a concern is to do so openly.

iv. Can concerns be raised confidentially or anonymously?

Whistle blowers are encouraged to put their names to allegations/ concerns raised in order to facilitate follow-up questions and investigation. Only those anonymous complaints where either material evidences, concrete facts, objective data and logical information are provided shall be considered for initiating initial inquiry / investigation.

v. Why did the HBL Bank develop this Whistleblowing Program?

Bank endeavours to achieve a culture of openness and accountability along with maintaining highest ethical standards in all its practices. In line with that commitment, it encourages all bank

staff (permanent, post retirement contracts, contractual and/or outsourced resources, interns and ex-employees), customers, & all stakeholders including directors, suppliers, vendors, contractors, consultants, service providers, shareholders or any other representative of the bank to raise matters of serious concern through Whistleblowing mechanism; rather than ignoring the problem or blowing the whistle outside.

vi. When can I blow the whistle?

You can blow the whistle on actual or potential violation of the law and/or code of conduct including, but not limited to, misconduct, unethical behaviour, fraud/ forgery, bribery, corruption, money laundering, terrorist financing, insider trading, password sharing, alleged dishonesty, danger to health & safety, bullying, personal harassment including sexual harassment, discrimination, regulatory misreporting, questionable accounting practices, auditing and financial reporting practices, breach of law, unauthorized use of bank's property, unethical / unfair practices or illegal activity occurring within the bank that may lead to financial, regulatory or reputational loss.

vii. What should I do if I want to blow the whistle-how do I do it and to whom do I go?

- **Hot line** - Whistle blowers may use a dedicated call number +92-21-111-333-425 with an option whether to record complaint directly or speak to designated Whistle Blow representative. The hotline would be functional for 24 hours and 7 days. If the informant wants to speak to Whistle Blow Unit representative as direct contact, this could only be facilitated during office hours: Monday to Thursday 9: 00a.m to 5: 30p.m and Friday 9: 00a.m to 6:00pm (Pakistan Standard Time) or office hours as may be prescribed from time to time. All complaints received at hotline will be automatically recorded. Both Chief Internal Audit and Chief Human Resource Officer will have the access to these recordings.
- **Email** - Whistle blowers may report matters to Ethics & Conduct-through a dedicated email address whistle.blow@hbl.com
- **Postal Mail** - Whistle blowers may report such matters through post-mail, addressed directly to the Chief Compliance Officer with copy to Chief Human Resource Officer and Chief Internal Auditor at following addresses:
 - Chief Compliance Officer, 32nd floor, SKY Towers, East Zone, Block 4, Clifton, Karachi, Pakistan
 - Chief Human Resource Officer 31st floor, SKY Towers, East Zone, Block 4, Clifton, Karachi, Pakistan
 - Chief Internal Auditor 13th floor, HBL Plaza, I. I. Chundrigar Road, Karachi, Pakistan

All such mails should be marked "confidential" on the outer envelope and "Whistleblowing" on the inside envelope for maximum confidentiality.

- **Website Form** – Whistle blower may report such matters through whistle blow's form available at HBL's website. as mentioned in Annexure III.
- **For International Operations** - In addition to the above, the stakeholders of international locations may also report their concerns to relevant Country Manager or Regional General Manager (RGM), who would then be responsible to bring it to the knowledge of CCO & CHRO HO in line with the above procedures.

Employee may report their concerns to their supervisor or one level above supervisor. The person with whom the information is shared would then be responsible to bring it to the knowledge of Whistle Blow Unit.

viii. Will my whistle-blower report be held in confidence?

Confidentiality will be maintained within the limitations of law and policy and the legitimate needs of the investigation.

ix. What if I am not sure whether certain actions or conducts are considered as improper, illegal, unethical or immoral practices, should I still report it?

Yes. The whistle blow unit will decide whether the matter for which whistle is blown are classified improper, illegal, unethical or immoral practices.

x. What information should I provide when I make my disclosure?

You should state the facts with as much specific information as possible so that your allegations can be investigated; such as brief the matter with clarity (with the name of person/department/branch involved), money amount involved (if any), time since matter existed, evidence if any (documentary or descriptive), brief remedial action that you suggest.

xi. What happens after I file my whistle-blower report?

After an initial assessment as to the appropriate treatment of each whistle blow matters detail assessment, investigation, or evaluation of the whistle blow matters would be conducted by the Consulting & investigation Unit, FRMU & HR-RM as the case may be. The investigation team will investigate the matter and will present its report / finding to the whistle blow unit. The decision making or respective authority will take the decision on the basis of the investigation report.

xii. Why might my allegations not be investigated?

Sometimes stakeholders blow the whistle about things that aren't illegal, immoral, unethical or improper, but are related to individual's personal grievances related to performance appraisal, promotions, bank provided benefits, compensation, discipline & concerns related to job posting etc. are not dealt in Whistleblowing Program and reported to Human Resources. The preliminary investigation assesses whether or not the reported matter appears to be an illegal, immoral, unethical or improper activity.

xiii. How can I help with the investigation?

You can provide as much factual information as possible in order to allow the investigation to proceed. However, don't obtain any evidence for which you do not have a right of access and do not do your own investigation, -leave that for the experts.

xiv. Can I blow the whistle for routine complaints?

For routine complaints there is a designated customer resolution unit established by the bank. Account statements not received, customer grievances, incorrect record of particulars, transactions not processed are some of the examples of the routine complaints. All kind of these routine complaints shall be reported to the bank's Customer Resolution Unit or Phone Banking instead of Whistle blow unit.

xv. Can I blow the whistle for HR related matters?

Only those HR concerns may be reported which have an entity wide implication or which are significant in nature. Further whistle can also be blown in case of inconsistent implementation of HR policies which comes to the knowledge of the employee. However, this does not include complaints of personal nature involving the employee themselves.

xvi. Can I discuss the matter with friends and colleagues?

To protect your confidentiality and the confidentiality of the investigation, it is advisable not to discuss the matter with friends and colleagues.

xvii. The Whistleblowing Program is long and detailed and I want to properly blow the whistle. Where do I go for help?

You can contact Whistle Blow Unit – Ethics & Conduct in order to get help for blowing the whistle.

xviii. If I blow a whistle, and if investigations find that there are no grounds for actions, will I be adversely impacted?

As covered in the Whistleblowing Program only those who are found to have acted maliciously will be subject to appropriate disciplinary/ remedial actions as deemed necessary.

xix. Will I be protected from retaliation?

Yes, safeguarding the whistle blower is the foremost responsibility. Management will ensure that stakeholders will not be at risk of suffering any form of retribution as a result of concerns raised/potential fraudulent practices reported by them; no matter whether the same are being proven or not; provided that they are acting in good faith and in a reasonable manner. There is no tolerance against personal harassment or victimization of whistle blowers. Any such act by the accused or other stakeholders will be **treated as gross misconduct**, which if proven, may result in disciplinary and/or other legal action(s) against the person involved.

xx. Can I withdraw whistle blown by me if I made a mistake?

Yes, you can. Kindly forward your request via the channels that you have raised the matter with the case reference number stating reasons for withdrawal.