



Punjab Skills Development Fund

Whistleblowing Policy

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1. Overview

The Punjab Skills Development Fund (hereinafter referred to as the “Fund”) is committed to continually operate at the highest standards of conduct in business. The Fund has adopted a Code of Conduct that establishes specific expectations regarding the behaviour of its personnel reflecting fairness, transparency and accountability; and is committed to maintaining an effective internal control environment to prevent and/or detect improper activities. However, even the best system of internal controls cannot provide absolute safeguard against irregularities, intentional or unintentional violations of laws, regulations, policies and procedures may occur. The Fund has a responsibility to investigate and address allegations of suspected fraudulent, wrongful, or improper activities.

2. Purpose

The purpose of the Policy is to create an environment by promoting a culture at the Fund where the internal staff as well as external parties feel motivated and confident to report any fraudulent or malicious activity, without any fear of retaliation, subsequent discrimination and of being disadvantaged in any way.

The Policy provides mechanism for the Whistle-blowers on reporting of suspicious activities and provides an assurance to the Whistle-blowers about secrecy and protection of their legitimate personal interests. The Policy assures that all reports received under the Policy would remain strictly confidential and that the Fund is committed to address reports (if any) that alleges acts of interference, revenge, retaliation and threats against the Whistle-blowers.

3. Scope

- The Policy, unless in contradiction to the terms and conditions agreed between the parties through an agreement, applies to the Fund, Board members, senior management, its employees (temporary / contractual or permanent), suppliers, contractors, including Training service providers (TSPs) and third-party consultants, and any person acting on behalf of the Fund.
- The Scope of the policy includes, but is not limited to, the deliberate and voluntary disclosure of the following acts:
 - a. Civil and criminal offences, including financial impropriety such as fraud, corruption, money laundering etc. as defined/interpreted under the law;
 - b. Failure to comply with an obligation set out in law;
 - c. Miscarriages of justice;
 - d. Intentional or unintentional damage to the assets and reputation of the Fund;
 - e. Collusive or coercive practices;
 - f. Endangering of someone’s health and safety;
 - g. An abuse of authority ;
 - h. Damage to the environment;
 - i. Activities that would affect the relationship between PSDF and its donors/sponsors;
 - j. Covering up wrongdoing in the above categories;
 - k. Any other activities which hinders the Fund to achieve its objective in fair and honest way.
- However, the Policy is not intended to replace the following existing procedures:

- a. If the concern relates to one's own treatment as an employee, such concern should be raised under the existing grievance or harassment procedures;
 - b. If a client has a concern about services provided to him/her, it should be raised as a complaint to the Fund;
 - c. Complaints of misconduct by The Funds' Employees should dealt with under a separate procedure by the HR Department.
- The Policy encompasses investigations to be conducted through BAFC, against complaints received by the Whistle Blowing Function (the "Function") regarding any irregularity, impropriety, financial malpractice, fraud, forgery, wrongdoing etc. This Whistle blowing Policy (the "Policy") is applicable to the entire Fund.

4. Definition

- a. **"PSDF"** means Punjab Skills Development Fund, also referred to as "the Fund".
- b. **"Allegations"** refer to accusing before proving with evidence.
- c. **"Whistle Blowing"** means the act of drawing public attention, or the attention of an authority figure to perceived wrongdoing, misconduct, unethical activity within public, private or third-party organisations. Corruption, fraud, bullying, health and safety violation, cover-ups and discrimination are common activities highlighted by whistle blowers.
- d. **"Whistle-Blower"** means employee, director, related officer, contractor, service user, shareholder, vendor, customer or any member of public, who makes or attempts to make a disclosure of an irregularity, financial malpractice, fraud, forgery, personnel harassment, improper conduct or wrongdoing.
- e. **"Whistle Blowing Function"** means operationally independent function established within the Audit, Risk and Compliance for receiving, handling and monitoring allegations, complaints and concerns raised by the complainant / whistle-blower.
- f. **"Fraud or fraudulent activity"** means acts of intentional concealment, omission or prevention of the truth or facts in order to:
 - a. Gain unlawful or unfair advantage;
 - b. Induce someone to a valuable gain or to forfeit one's legal right;
 - c. Harm someone in any manner.

A person (employee, TSP or any external party etc.) might be guilty of fraud, for example, if they indulge in wrongful or criminal deception intended to result in financial or personal gain.

- g. **"Operational activity"** means tasks that are performed to run day to day operations of the Fund. These include, but not limited to, the following:
 - Resolution of grievances during bidding process;
 - Delays in payment of stipend to trainees;
 - Delays in invoice processing;
 - Implementation of business rules;
 - Complaints related to employees grievances and/or harassment.

h. **“Improper Conduct or Wrongdoing”** means purpose of this Policy, improper conduct or wrongdoing is defined as:

- Corrupt conduct;
- Fraudulent activity;
- Gross misconduct, as defined under PSDF HR manual;
- Substantial mismanagement of the Fund’s resources that sabotage the Fund’s mandate, business and objectives;
- Intentional or unintentional damage to the assets and/or reputation of the Fund;
- Non-financial allegation of misconduct.

That would, if proven, constitute:

- A civil or criminal offence; and
- Present reasonable ground(s) for dismissing or dispensing with, or otherwise terminating, the services of party who was, or is, engaged in that conduct; or
- Taking other disciplinary action.

“Corrupt conduct” is the misuse of public or entrusted power in order to gain private profit. In the business environment, corruption means, but is not limited to, the following:

- a. Bribery;
- b. Extortion;
- c. Cronyism or Nepotism;
- d. Coercive or collusive practices;
- e. Building cartels;
- f. Embezzlement

i. **“Malicious”** mean intent to cause harm without justification and regard for legal rights.

j. **“Coercive practices”** mean impairing or harming or threatening to impair or harm, directly or indirectly, any persons or property to influence any person’s participation or action in the procurement process including the selection process and bidding process, or execution of the contract or any acts of a person in order to achieve a wrongful gain or to cause a wrongful loss to another party.

k. **“Collusive practices”** mean arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party. This may include arrangements to influence the action of any party in the selection or procurement process or the execution of a contract or to establish bid prices at artificial, non-competitive levels.

l. **“Protected Disclosure”** means communication in good faith based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence a wrongdoing or improper conduct.

m. **“Whistleblowing Team”** means an independent Team constituted under this policy.

n. **“Investigation Team”** is the independent team of personnel constituted by the Whistleblowing Team in order to carry out the investigation.

o. **“Suspected Party”** means a party likely to be guilty as per the whistle-blower.

5. Types of Violations

The types of violations include, but are not limited to, the following:

- Any act of bribery, theft, corruption, coercion or any other type of violation of any law or regulations;
- Fraud relating to procurement of good and services;
- Stealing, mismanagement or misappropriation of company funds/assets;
- Manipulation of Company data/records;
- Activities violating company policies and manuals, including the Code of Conduct;
- A substantial and specific danger to public health and safety;
- Authorizing, receiving or paying any undue compensation for goods not received or services not performed;
- Unauthorized alteration or manipulation of the Fund's documents or computer files in violation of the Fund's practices;
- Unauthorized disclosure of confidential information;
- Deviation from full and fair reporting of the Fund's financial condition.
- Any fraudulent case or safeguarding issues (exploitation/abuse of vulnerable groups e.g. women, disabled, minorities) can also be reported under this policy. However, these cases will be settled through the relevant policy, Code of Conduct and HR manual for PSDF staff and relevant contract clauses in case of training providers

6. Whistle Blowing Function

In order to ensure independence of the Policy, a dedicated Whistle Blowing Function should be established within the Audit, Risk and Compliance Department of the Fund, under the umbrella of BAFC. The Function will report to the Chief Internal Auditor, who will report to the BAFC.

The Chief Internal Auditor should designate a team of personnel solely responsible for handling the complaints. Their job should be to handle and entertain the complaints along with filing an Initial Information Report (IIR). Timely reviews of the personnel are mandatory to be carried out by the Chief Internal Auditor in order to assess objectivity and independence.

The Composition of the Whistle-Blowing Team :

The Team should comprise of the following officials of the Fund:

- a. Chief Internal Auditor;
- b. Head of Human Resource Department (for employees related investigations); and
- c. Any other Head of the Department with the consent of rest of the BAFC.

The formation of the Investigation team:

The Whistleblowing Team should form an Investigation Team if they deem appropriate, in order to analyse the case. The members of the Whistleblowing Team may appoint their representatives from their respective departments to form a part of the Investigation Team. However, the representative should be a competent person who should not be ranked lower than the Assistant Manager.

7. Communication Channels for Lodging Complaint

Employees or outside parties with concerns or complaints may report such concerns or complaints through the Fund's e-mail, website, mobile or regular mail as stated below:

- a. Email: whistleblow@psdf.org.pk
- b. Website: www.psd.org.pk
- c. Mobile: +92 3114656486
- d. Postal address: Whistle Blowing Function, Head of Audit, Risk and Compliance, Dr Mateen Fatima Rd, Block H Gulberg 2, Lahore, Punjab.

Apart from the channels mentioned above, whistle can be blown through any other independent source such as portals established by Government of Punjab or any other donor/sponsor as per whistle blower's discretion and preference.

These communication channels shall be publicly available at website and shall be clearly displayed at all training centres through flexes or placards etc.

Concerns and complaints received through any of these means shall be forwarded to the Chief Internal Auditor for consideration of further actions.

8. Handling of Complaints

- a. All calls received through hotline shall be recorded. Every complaint received by the Function must be logged into a tracking system and assigned a code. This code will be used in all subsequent processes including investigation and reporting of the allegation/complaint. Access to information regarding identity of the complainant will be restricted to Whistleblowing/Investigation Team. Where a complaint has been received directly by the CEO, any Director, any HoD of the Fund or any other external source, the relevant personnel should immediately forward the complaint to the Function for it to be treated as a formal whistle.
- b. Once the complaint has been assigned a code and logged into the tracking system, the relevant personnel of the Function should acknowledge the receipt of concern or complaint to whistle blower within 3 working days of the receipt and prepare a IIR to present to the BAFC and donor/sponsor.
- c. Whistleblowing function shall not have any overriding rights or right to delete or alter the record of calls, IIRs and other documented information.
- d. Every IIR will be assessed by the Whistleblowing Team with a view to decide whether the complaint launched is of an Operational or Fraudulent nature and materiality of the whistles. In case, the Chief Internal Auditor believes that the complaint does not fall under the category of a whistle, the Chief Internal Auditor may refer it to the relevant department to be dealt under their respective policy. However, the same will be informed to the BAFC for information purposes.

In case complaint involves any irregularity in the Fund's functions that are outsourced or that involve any partnering third party, the Chief Internal Auditor will share the pertinent facts of the complaint with the owner/partner/responsible officer of the respective third party in writing. The supplier will respond to the allegations and provide the relevant facts/evidences related

to the matter. The Whistleblowing Team will consider/evaluate the response of the third party while concluding the matter.

- e. If any complaints are received involving personnel harassment, they will be referred to Fund's Human Resource Management for their appropriate action(s) in accordance with the Policy for Protection of Women against Harassment or other relevant policy. However, the same will be informed to the BAFC as well.
- f. All complaints received under the Policy should be forwarded to BAFC and donor/sponsor.
- g. All the cases warranting investigation should be forwarded by the Whistleblowing Team to the Investigation Team for further investigation. However, due to the severity of the matter, if the Whistleblowing Team determines that the investigation should be outsourced to an external party, it should propose the suggestion, along with its rationale, to the BAFC. If BAFC considers it necessary, the investigation may be outsourced to an external independent party in accordance with the Accounts and Finance Policies and Procedural Manual of the PSDF.
- h. Investigations shall be conducted by competent and independent personnel, who should observe ethical and professional standards.
- i. Investigation shall be completed within 6 to 8 weeks.
- j. A preliminary investigation will be conducted for all whistles. If the whistle blown is not substantiated by an appropriate evidence or if the allegation / information is not sufficiently specific and contains inadequate corroborating evidence, the Whistleblowing Team should send letter requiring evidence to the complainant within 5 working days of the receipt of letter for further clarification. If after the preliminary investigation, a whistle cannot be substantiated by sufficient and appropriate evidence, the CIA shall recommend to the BAFC if whistle blown could not be further investigated along with reasons and request for closure of complaint. The whistle will be deemed closed upon advice of BAFC and the complaint shall be dealt under False Allegation section of the Policy.
- k. The amount of contact between the complainant and the Team conducting the investigation shall depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.
- l. In conducting any investigation, the Investigation and Whistleblowing Team shall use reasonable efforts to protect the confidentiality or anonymity of the complainant, consistent with the need to conduct an adequate review.
- m. All complains should be forwarded to the CEO for information purpose.
- n. In any case, relevant authority shall provide an opportunity of being heard to alleged offender.
- o. The Investigation Team should forward its recommendations, along with the investigation carried out on which the recommendations are based, to the Whistleblowing Team which shall review the investigation process and the recommendations and, after verification, forward them to the BAFC. The recommendations that are forwarded to the BAFC by the Whistleblowing team should be deemed to be made by them.
- p. Prompt and appropriate corrective action shall be taken as warranted in the judgment of the BAFC. However, if the matter is related to employee of the fund, the BAFC may obtain viewpoint of CEO while determining any corrective action.

- q. When possible, and if determined appropriate by the Function, notice of any corrective action taken will be reported back to the person who submitted the complaint, if return email or other address is provided by the complainant. Action(s) taken by the Fund will depend on the nature of the complaint and the results of the investigation. The final investigation report will be forwarded to Head of HR in case disciplinary action is required against the delinquent staff for necessary action. Copy of this report will also be endorsed to concerned Department Head. However, if considered necessary, the report will also be shared with the Chairman BOD.
- r. If a whistle blower or the person against whom the whistle was blown, is not satisfied with the decision of BAFC, he/she may report directly to the Board of Directors, Government of Punjab or any other sponsor/donor.

9. Complaints against Chief Executive Officer/Board Members

While assessing the IIR, if the Whistle blowing Function determines that whistle is blown against CEO or any of the Board members, or any such person is related to the case, such IIR shall be referred to BAFC by CIA.

BAFC shall present the matter to the Board, without the presence of such member.

The Board shall decide whether the case shall be investigated within the Fund or through an external party. However, whomsoever conducts the investigation, Board shall be the final authority to take prompt and corrective action, as it deems appropriate.

A person who is so alleged or is related to the case, shall not form part of the meeting or have any voting right to decide on the matter.

10. Complaint against Whistleblowing Team and Investigation Team

In case a whistle blow complaint is received against Whistleblowing Team or Investigation Team or any of its member or any member of ARC or HR department, the matter will directly be presented to BAFC. BAFC will assess the complaint and decide whether to outsource the investigation to an external independent party or to form a separate internal team to conduct an inquiry into the complaint.

Whom so ever will conduct the investigation may follow the procedures as stated in section 8 "Handling of Complaints" above.

11. Closure of Whistles

The Function should close a whistle on the directions of the BAFC and donor/sponsor. Once the BAFC and donor/sponsor has decided to close the whistle, it would be marked as "closed" in the tracking system.

12. Void Complaints

The following type of complaints would ordinarily not be entertained:

- a. Vague, trivial or frivolous in nature;

- b. The matters which are pending before a Court of Law, State or National Human Rights Commission or any other Commission, Tribunal or any other judiciary body;
- c. Allegation, which is not against the interests of the Fund's employee as stated above;
- d. Issue raised relates to civil dispute, such property rights, contractual obligations, etc.;
- e. Issue raised relates to service matters.

13. Materiality of the Whistles

The Whistleblowing Team should review and decide whether the whistle that is blown is material or immaterial on qualitative basis. Irrespective of the amount, whistles that are related to the following matters should be considered as material:

- Fake and ghost trainees;
- Likely to damage the reputation of the Fund;
- Have a substantial regulatory impact; and
- Any other fraudulent act.

14. Suggestive Punitive Actions

The following punitive actions could be taken against accused person, where the Whistleblowing Team finds the accused guilty:

- Counselling and a Warning letter;
- Withholding of promotion / increments and/or bonuses of employees;
- Termination;
- Legal Suit; and
- In case of external vendors, blacklisting of the vendors by procurement department.

On matters not directly relating to the CEO or Board members, BAFC shall decide on the actions to be taken on a case-to-case basis depending on the gravity of the offence. For all employee related actions, the BAFC may also obtain viewpoint of CEO. BAFC/Board/ CEO may obtain legal advice to ascertain the company's responsibility regarding reporting the instance to the authorities i.e. Police, Federal Investigation Authority (FIA), SECP etc. and how to protect company's interest.

15. Responsibilities of the Fund and others

- Where a complaint under the Policy has entered the investigative phase, the Fund should ensure that the alleged employee is suspended from duties until a conclusion is reached and necessary actions have been taken after taking approval from BAFC. The suspension should be with pay, however if the allegations are substantiated against the employee decision may be made of deductions from his/her salary, benefits, if required.
- Where the complaint is against a TSP and the investigation has started, payments of TSP for the specific scheme will be withheld till the completion of investigation. However, this should not affect the ongoing classes of the TSP. Whistle-blow complaint against any TSP will not affect bid evaluation & contract execution unless the complaint is proved. In case the whistle is blown against a TSP for a scheme that has already been concluded and all payments settled, an exception will be made and the payments for the ongoing scheme will be withheld for the period of the investigation. In case the whistle is blown against a TSP for a scheme that has already been concluded and all payments settled, an exception will be made and the payments for the ongoing scheme will be withheld for the period of the investigation. For this purpose, an undertaking will be sought from TSP, that no payments will be claimed during the investigation

period. In case resolution of case is in favour of TSP, 80% payment will be made after clearance from Whistleblowing function and approval of Audit, Risk and Compliance Department. Remaining 20% payment will be made after closure of complaint by BAFC and international donor.

- The BAFC will put in place a mechanism to evaluate effectiveness of Function under the Policy. In addition to this, names of the official(s) responsible for receiving, handling and monitoring whistle blow complaints shall be presented to the Audit, Risk and Compliance and BAFC for periodic review.
- The Fund will ensure that the Policy is fairly and consistently applied. It should spell out zero tolerance for all violations e.g. fraudulent, immoral, unethical or malicious activities.
- The Fund will ensure that Whistle-blower should feel secure while reporting fraudulent, immoral, unethical or malicious activities.
- To motivate the Fund's staff to behave honestly, in loyalty with the Fund, independently without any fear, for saving the Fund from risks of financial or reputational losses caused by fraudulent, immoral, unethical or malicious activities or misconduct of some dishonest and corrupt persons, the management may offer incentives.

16. Responsibilities of Whistles-Blowers

- If any fraud, forgery, fraudulent, immoral, unethical or malicious activities have occurred due to involvement of the Fund's officials, the employees who have knowledge are ethically and morally bound to Whistle Blowing or take appropriate action if they are authorized to.
- It is expected that the Whistle-blower shall remain unbiased while reporting matters under the Policy.
- In making a disclosure, the Whistle-blower should exercise due care to ensure the accuracy of the information. Whistle-blower should not make repeated, malicious, wrong, not based on facts, based on personal grudges, grievances or personal enmity or vexatious allegations. In such a case, appropriate action may be taken against the Whistle-blower as defined in the false allegation section of the Policy.
- It is expected from all employees to refrain from rumour mongering, irresponsible behaviour and false allegations and if staff makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, staff makes malicious or frivolous allegations /complaint(s) or misuse the Policy for undue posting/transfer of himself/herself on disclosure to team member/ senior about whistle blown or the shelter available under the Policy, action may be taken against them after proper investigation.

17. Rights and Responsibilities of Suspected Parties

- The suspected party of a Whistle Blowing investigation has the right to consult with a person of their choice. This may involve representation from colleague from the Fund, if permissible under law.
- The suspected party has a responsibility not to interfere with the investigation. They are not to withhold, tamper, or destroy evidence or influence, coach or intimidate witnesses. Unless there

are compelling reasons to the contrary, subjects should be given the opportunity to respond to material points of evidence contained in an investigation report.

- The suspected parties are bound to answer / respond to the queries made by the investigator and appear in person if called for by the investigator.
- It is the responsibility of every employee of the Fund to extend full cooperation during the investigation. Any instance of non-cooperation shall be dealt with in accordance with the Fund's human resource policies / procedures.

18. Protection of the Whistle-Blowers

- a. The Fund stands committed to protect Whistle-blowers for Whistle Blowing, harassment or victimization of the Whistle-blower will not be tolerated.
- b. The Whistle-blower may choose to disclose the information on the condition that their identity is not disclosed to the suspected party and the Fund shall make a reasonable effort to ensure such anonymity.
- c. If the Whistle-blower feels that, at his / her place of posting, he / she might be subjected to victimization or harassment by the alleged officials after blowing the whistle, the management may consider transferring him/her to another suitable department/position on his/her request. However, this assurance is not extended in cases where it is proved that the Whistle-blower raised the matters to settle his / her personal grudges or grievances or enmity or where the Whistle-blower has been habitually involved in complaining petty issues.
- d. Protection that the Fund can extend to the Whistle-blower is limited to the Fund's capability, but any retaliatory action against any Whistle-blower as a result of whistle blown by such person under the Policy shall be treated as Misconduct and subject to disciplinary action.

19. Retention of Whistle Blowing Complaint

All whistle blowing complaints received at the dedicated email address, through mail or through whistle blowing form available at the Fund's corporate website shall be retained for 5 years after which the complaints may be discarded as per the Fund practices.

20. Confidentiality

All concerns raised will be treated in confidence and wherever required, every effort will be made to maintain confidentiality of the whistle blower's identity. At an appropriate time, one may however, need to come forward as a witness. The policy encourages all to believe that disclosure of concerns is in the Company's interest.

21. Training and Awareness

The Fund will circulate the Whistle Blowing Policy for the information of all the employees of the Fund and arrange orientation sessions. The fund should disseminate it publicly for all stakeholders as widely as possible. The policy shall be available at website of the Fund. The TSPs shall be given an orientation during the Roadshows and at the time of signing the contract.

22. Anonymous Allegations

Concerns expressed anonymously are much less powerful and may lack supporting evidence. However, these will still be reported to BAFC and will be investigated as per the policy. The Whistleblowing Team will assess the seriousness of the issue raised and the likelihood of confirming the allegation from other sources.

23. False Allegations

If any person makes an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Whistleblowing Team will recognise the concern and the complainant will not be harmed. If, however, an allegation is made frivolously, maliciously or for personal gain, appropriate action should be taken as per the discretion of the BAFC, who may obtain viewpoint of CEO, as long as the whistle has not been blown against the CEO or Board member(s). Furthermore, in case the person is the employee of the Fund, the matter should be dealt under the gross misconduct section of PSDF HR policy.

24. Revision

The Chief Internal Auditor shall be responsible for keeping this document updated from time to time. Therefore, the Policy shall be subject to a formal review by the Chief Internal Auditor on a periodic (at least once in every three years) basis and the proposals for any changes/modifications/ amendments therein shall be submitted to the BAFC for consideration and its further recommendation to the Board of Directors for approval.

25. Review

This policy should be reviewed by the Board and may be changed, modified or abrogated at any time on recommendation of the any Committee of the Board.

26. Effective Date

The Whistle Blowing Policy will be effective from the date of its approval by the Board of Directors i.e. January 08, 2021.

PUNJAB SKILLS DEVELOPMENT FUND

Whistle Blowing Form

For office use only	
Date	
Ref. No	
Received by	

1. WHISTLEBLOWER / REPORTER'S CONTACT INFORMATION	
Name	
Contact Number	
Address	

2. ACCUSED / SUSPECT'S INFORMATION	
Name	
Designation	
Organization (optional)	
Contact Number(optional)	
E-mail Address(optional)	
Residential Address(optional)	
Any Other Details about Suspect	

3. COMPLAINT TYPE	
Theft & embezzlement	<input type="checkbox"/>
Corruption and bribery	<input type="checkbox"/>
Procurement related fraud	<input type="checkbox"/>

Misuse of PSDF resources / authority	<input type="checkbox"/>
Failure to comply with requirement related to financial disclosure and/or local laws	<input type="checkbox"/>
Harassment	<input type="checkbox"/>
Safeguarding Issue	<input type="checkbox"/>
Misrepresentation of facts	<input type="checkbox"/>
Breach of funding agreement	<input type="checkbox"/>
Any other	<input type="checkbox"/>

<p>4. BRIEF DETAILS OF THE COMPLAINT</p>

Action Plan:
Follow up Status: