

## **Whistle Blowing Policy**

### **1. PURPOSE:**

This Policy aims to establish a comprehensive framework at Mahaana Wealth Limited that empowers employees to confidentially report any unlawful, unethical, suspicious, or fraudulent behavior within the organization without fear of retaliation. It is intended to foster a culture of openness, integrity, and accountability, while helping protect Mahaana Wealth from potential reputational and financial harm.

### **2. SCOPE:**

This Policy is applicable to all individuals employed by Mahaana Wealth Limited, including permanent staff, contractual workers, and personnel engaged through third-party service providers.

### **3. RESPONSIBILITIES:**

The Compliance Department, under the supervision and guidance of the Audit Committee, is responsible for implementing and overseeing procedures for the receipt, retention, and resolution of complaints pertaining to the Company's operations, as well as its interactions with customers and other stakeholders.

### **4. WHAT IS WHISTLE BLOWING?**

Whistleblowing refers to the act of disclosing or reporting information concerning illegal, unethical, suspicious, or fraudulent activities occurring within the organization. It involves an employee or any other individual with relevant knowledge who raises concerns to the appropriate authorities empowered to take corrective action. Whistleblowing serves a vital function in fostering transparency, accountability, and ethical conduct within the organization. It plays a key role in uncovering misconduct, preventing harm to stakeholders or the environment, and facilitating investigations, prosecutions, and institutional reforms.

Under this Policy, the role of a Whistleblower is limited strictly to the reporting of concerns. The Whistleblower is not expected to conduct investigations or determine the appropriate corrective or remedial actions required in response to the disclosure.

### **5. DEFINITIONS:**

**"Anonymous"** refers to the state of unknown authorship, where no identifying information is provided that could reasonably lead to the disclosure of the individual's identity. Anonymity is not compromised by the assignment of a code or other designation that allows for communication without revealing the individual's identity.

**"Complaint"** refers to a genuine concern regarding malpractice, illegal activity, or failure to adhere to recognized standards of conduct. This may include adverse information reported to the Company in the form of a concern, request for remedial action, or allegation of a suspected violation of law or Company

policy—particularly those related to accounting, internal controls, auditing, or any other area or function within the Company.

#### **6. POLICY STATEMENT:**

- i. Mahaana Wealth is committed to the highest standards of integrity, professionalism, and ethical conduct.
- ii. Employees are expected to act with honesty, impartiality, and accountability at all times.
- iii. The Company encourages the reporting of genuine concerns related to malpractice, illegal activity, or policy violations—without fear of retaliation.
- iv. Disclosures must be made in good faith, with a reasonable belief in their accuracy, and not for personal gain.
- v. Malicious or knowingly false reports will be treated as serious misconduct and may result in disciplinary action, including dismissal.
- vi. Mahaana Wealth reserves the right to amend this Policy in line with legal or organizational changes.

#### **7. ISSUES ON WHICH WHISTLE CAN BE BLOWN:**

This Policy encourages the reporting of actions or behaviors that violate the Company's core values, Code of Conduct, or HR Handbook guidelines. However, personal grievances related to employment terms or conditions should be addressed directly to the Human Resources Department.

#### **8. PROCEDURES TO BLOW A WHISTLE:**

- i. Employees may report concerns through any of the following channels:
- ii. **Email Submissions:**
  - a. To the **Chairman, Audit Committee** at: [complaints@mahaana.com](mailto:complaints@mahaana.com)
  - b. To the **Head of Compliance** at: [complaints@mahaana.com](mailto:complaints@mahaana.com)
- iii. **Physical Mail (Sealed Envelope):**
  - a. Addressed to:
    - i. *Chairman, Audit Committee, Mahaana Wealth Limited, or*
    - ii. *Head of Compliance, Mahaana Wealth Limited*
  - b. **Postal Address:**  
Mahaana Wealth Limited  
NASTP Silicon, Shahrach-e-Faisal
- iv. Physical complaints addressed to the Chairman of the Audit Committee must be forwarded **unopened and in their original sealed condition.**
- v. Whistleblowers are encouraged to provide **background information and relevant documentary evidence**, if available.
- vi. **Anonymous Reporting:**
  - a. Anonymous reports are allowed.

- b. However, employees are encouraged to provide contact information to support further investigation.
- c. Anonymous complaints based on personal bias or prejudice may not be acted upon, subject to a preliminary review by the Chairman of the Audit Committee or the Head of Compliance.

#### **9. RESOLUTION OF COMPLAINTS:**

- i. All complaints will be treated strictly confidentially.
- ii. The anonymity of the complainant will be maintained unless the complainant chooses to disclose their identity.
- iii. Although maintaining anonymity may hinder an effective investigation, systems will be designed to allow communication with the complainant while preserving anonymity.
- iv. Complaints addressed to the Chairman of the Audit Committee may be forwarded to the Head of Compliance for investigation.
- v. Any recommended disciplinary action arising from the investigation will require approval from the CEO.
- vi. Complaints against the leadership team will be directly handled by the Board Audit Committee.
- vii. The Head of Compliance will report quarterly to the Board Audit Committee, providing a summary of all complaints received, actions taken, and updates on ongoing investigations.
- viii. The Chairman of the Audit Committee may present details of any or all complaints to the Board.
- ix. The Chairman of the Audit Committee or CEO may engage independent advisors, such as outside counsel or accountants, at the Company's expense to guide or assist in the investigation.
- x. Investigations will be conducted promptly and with sensitivity. An official written record will be maintained at each stage of the process.
- xi. The person(s) against whom the allegations are made may be suspended during the investigation, depending on the nature and seriousness of the complaint.
- xii. The nature of any disciplinary action taken will remain confidential and will not be disclosed to the whistleblower.
- xiii. Internal Audit will inspect the complaint email addresses and/or courier logs annually to ensure all registered complaints are properly handled and accurately reported to the Board Audit Committee.
- xiv. If no complaints are received during the financial year, the Head of Compliance will report to the Audit Committee on the process for creating awareness and receiving complaints, ensuring its efficiency, confidentiality, anonymity, and effectiveness.

#### **10. PROTECTION AND NON-RETALIATION:**

- i. The Company prohibits any form of retaliation against Whistle blowers.
- ii. Whistle blowers who experience retaliation should report it immediately to the Head of Compliance.

- iii. The Company will take appropriate action to address and prevent retaliation.
- iv. Identity of the whistle blower will in all cases be protected and remain confidential.

#### **11. RETENTION OF RECORDS OF COMPLAINTS:**

Records related to complaints are the property of the Company and shall be retained by the Compliance Department in accordance with applicable laws and the Company's document retention policies. These records will be kept in a manner that ensures the confidentiality of the information and, where applicable, maintains the anonymity of the complainant. Additionally, the records will be managed in a way that maximizes their utility to the Company's overall compliance function, supporting the effective management and resolution of complaints.

#### **12. TRAINING AND AWARENESS TO STAFF:**

Appropriate training and awareness sessions on the Whistleblowing Policy will be conducted for all staff, including new joiners, to ensure they are aware of their responsibilities under the Policy. The Policy will be disseminated to all employees, and once approved, it will also be included in the Employee Handbook.