



WHISTLE-BLOWING POLICY

K- Electric Limited (the “**Company**”) is committed to maintaining high standards of business conduct and ethics, this policy is to further reinforce that commitment. The Company encourages its employees, customers, suppliers, contractors or anyone associated with the Company to report serious concerns they may have on matters such as breach of law, company policies or established standards or practices, possible breaches related to compliance or improper conduct, unethical behaviour or suspected fraud.

This Policy establishes a whistleblowing system by providing a procedure for lodging concerns by employees, customers, suppliers, contractors, or anyone associated with the Company, handling of concerns by the Company, reporting requirements and protection of whistle blowers.

It is to be noted that this Policy is designed to assist individuals who believe they have discovered malpractice or impropriety. This policy deals with concerns which are specifically in the public interest or in the interests of the Company. It is not designed to question financial or business decisions or to address routine employee grievances, which should be dealt with in accordance with the HR related policies whereby a separate mechanism exists under the name of AWAZ, a copy of which is available from HR department.

Further, this policy is also not designed to address customer complaints related to new connections, faults and billing for which 118 and customer care should be contacted.

It should be noted that whistleblowers while raising a Concern, should exercise due care to ensure the accuracy of the information disclosed. Deliberately raising a false Concern and making malicious or vexatious allegations is a breach of this policy and may lead to a disciplinary action.

For this policy, improper conduct or wrongdoing may include matters such as:

- Any fraudulent activity, theft or corruption
- A civil unlawful or criminal act
- A substantial mismanagement of Company resources
- Actual or potential improprieties in financial and other matters
- Violation of Company’s Code of Conduct, policies, SOPs
- Improper conduct in Company’s operations
- An action leading to incorrect financial reporting
- An act detrimental to the interest or reputation of the company
- An act of harassment, discrimination, or unfair practices
- Concealment or attempts to conceal any of the above.



All complaints received under this policy shall be handled by a **Whistleblowing Committee (“WBC”)** comprising the following:

- Chief Internal Auditor (Head of WBC)
- Company Secretary
- Chief of Security

The WBC may opt in Concerned CXO or Direct Report of CEO, as and when it deems fit. The WBC will report to the Board Audit Committee.

The Concerns may be reported via courier or electronically by email to the WBC at following addresses:

- Whistle Blowing Committee, KE House, 39-B Sunset Boulevard, DHA-II (Ext), Karachi, Pakistan.
 - WBC Email: speakup@ke.com.pk
- i. Each Concern received by WBC will be logged and assigned a code that will be used in subsequent investigation and reporting of the Concern.
 - ii. An initial inquiry shall be conducted by WBC to determine whether further review and/ or investigation is required based on the sensitivity of the issue.
 - iii. An investigation will only be conducted if information provided is sufficiently specific and if it contains adequate corroborating evidence to warrant an investigation.
 - iv. WBC will have the authority to utilize the services of any Company personnel by forming a WBC unit in writing under the circumstances on a case-to-case basis to assist in investigation of the reported Concern.
 - v. The investigations will be preferably completed within 30 days from the lodging of the Concern. However, in exceptional circumstances the time may be extended for reasons to be recorded in writing.
 - vi. If the conclusions of the investigation accord with the reported Concern, the WBC will take appropriate action to both correct the issue and (so far as practicable) prevent it from happening again. Such action may include disciplinary or other appropriate procedures.

The Company is committed to the protection and confidentiality of genuine whistle blowers as well as any person or body, aiding or taking part in the conduct of the relevant investigations. At the same time, anonymous whistle blowing reporting will only be taken into consideration for investigation if supported with credible evidence or proof.