

# CTC Group

## "WHISTLEBLOWING" POLICY

### TABLE OF CONTENTS

1. INTRODUCTION.....	2
2. DEFINING WHISTLEBLOWING.....	2
3. SCOPE & OBJECTIVES OF WHISTLEBLOWING POLICY.....	2
4. WHOM TO CONTACT .....	3
5. HOW TO BLOW THE WHISTLE.....	3
6. ANONYMOUS ALLEGATIONS .....	4
7. SUSPECTING A COMMITTEE MEMBER IS AWARE .....	4
8. CONFIDENTIALITY & PROTECTION.....	4
9. INVESTIGATIONS AND THEIR OUTCOMES .....	4
9.1. UNTRUE ALLEGATIONS.....	4
9.2. TIMESCALES.....	5

## CTC Group "WHISTLEBLOWING" POLICY

### 1. INTRODUCTION

CTC Group along with its stakeholders including clients & employees (both current & future); international suppliers & local vendors; regulatory bodies & custom authorities do benefit from the continuation & prosperity of the on-going business transactions (business as usual). To this end CTC Group employees have the freedom to speak up and are encouraged to raise their concerns internally rather than externally.

Type of "Concerns"\*:

	Concerns to be raised thru grievance policy channels	Concerns to be raised thru whistleblowing channels
<b>Intention</b>	Personal matters such as being victimised, harassed, or bullied.	Non personal interest exist but rather aiming to safeguard the public interest
<b>Aim</b>	To air differences and then seek to find mutual agreement thru formal channels	Prevent unsuccessful outcome of the usual planned business activities
<b>Subject</b>	Wrongdoing reported directly affects the person or group of people submitting the grievance	Wrongdoing includes serious concerns such as committing a crime; miscarriage of justice; breach of a legal obligation; causing damage to environment or assets; creating risk to business or any of its stakeholders; or attempts to conceal any of these
<b>Method</b>	To encourage prompt solution thru exhausting informal means first (concerned line manager)	Swift & proportionate investigation to establish the facts by the formally assigned committee
<b>Needs</b>	Fair hearing under the right conditions for employees to speak up	
<b>Goal</b>	Prevent existing or suspected fraud and malpractice whether affecting CTC Group directly or indirectly	
<b>Condition</b>	Individuals are held accountable if proven to raising concerns in bad faith or to unethically gain personal benefits & unlawfully	

\* Concerns of customers are raised by filling a complaint. Customer complaints have their own formal channels.

### 2. DEFINING WHISTLEBLOWING

Whistleblowing is a framework for dealing with serious concerns. An employee will blow the whistle and disclose information that he/she believes shows malpractice or impropriety. The disclosure of information will be on actual or suspected wrongdoing that will result in undesired consequences that would negatively affect CTC Group in anyhow.

### 3. SCOPE & OBJECTIVES OF WHISTLEBLOWING POLICY

This policy applies to full-time permanent employees working at CTC Group or one of its subsidiaries, and its contractors, sub-contractors, customers, vendors, agents, suppliers and partners. The benefits of having a whistleblowing policy are uncovered when one views the

damage caused by the different types of wrongdoing, including criminal offence; financial malpractice; failure to comply with a legal obligation; causing danger to someone's health or safety; causing damage to assets or the surrounding environment, or covering up wrongdoing of any of the mentioned here. These actions cause injustice and must be dealt with appropriately and promptly. The whistleblowing policy objectives are as follows:

- Assist in preventing and managing business risk.
- Safe guarding CTC Group from possible consequences of injustice acts, behaviours or intentions.
- Protecting business conduct by upholding zero-tolerance towards detected fraudulent activities.
- Allow easily accessible channels to make a disclosure while ensuring confidentiality & protection.

#### **4. WHOM TO CONTACT**

Any employee who suspects dishonest or fraudulent activity can notify the Group Internal Auditor or can come forward to a member of the whistleblowing disclosure committee (see below), and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.

A dedicated committee will be in session to look into all whistleblowing disclosures received as directed by CTC Group President. This committee has the following members:

- Group COO
- Group Internal Auditor
- Group Human Resources Manager
- Group Legal Advisor

This committee is chaired by CTC group COO who calls on committee to be in session and he is responsible for ordering the closure of an investigation and presenting recommendations reached by the committee to CTC Group President.

#### **5. HOW TO BLOW THE WHISTLE**

If an employee wishes to make a disclosure, he/she can contact any of the committee members mentioned above through email or to come forward to a committee member and meet in person.

## **6. ANONYMOUS ALLEGATIONS**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the committee.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

## **7. SUSPECTING A COMMITTEE MEMBER IS AWARE**

In case the whistleblower is suspecting that one or more of the committee members is aware of the wrongdoing or involved in the wrongdoing, the whistleblower has the right to bypass the committee and directly disclose the information in hand to CTC Group President.

CTC Group President has the right to refer the complaint back to the committee, if he feels that the committee, without any conflict of interest, can more appropriately investigate the complaint.

## **8. CONFIDENTIALITY & PROTECTION**

The committee is obliged to provide feedback to the whistleblowers on the disclosures they have made. The committee will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. Furthermore, the committee will ensure that the whistleblower is protected. This action will be under the discretion of the committee.

## **9. INVESTIGATIONS AND THEIR OUTCOMES**

The committee will be in session and offer feedback to the whistleblower on the outcome of the investigation conducted within reasonable time from receiving the disclosure.

### **9.1. UNTRUE ALLEGATIONS**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information.

If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, the committee has the right to consider the appropriate decisions and apply the appropriate disciplinary action for each case separately:

- The committee found that the disclosure received holds no truth and it was of a malicious nature to work against public interest or the interest of the suspect.
- The committee found that the whistleblower did cover up or delay making the disclosure due to negligence.

## **9.2. TIMESCALES**

Due to the varied nature of these sorts of complaints, which may involve internal investigators and/or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.