



Whistle Blower Policy

Introduction:

A Whistle blower is an employee who, in good faith, reports wrongdoing in organization to appropriate authority.

1- Scope:

M/s. SYED FARAZ EQUITIES (PVT) LIMITED ("**SFEL**") requires from its all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the **SFEL**, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

This policy is intended to encourage all employees to come forward and report through appropriate channels (on a confidential basis if the employee so desire) without fear of revenge or unfair treatment.

This Whistle blower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that **SFEL** can address and correct inappropriate conduct and actions. It is the responsibility of all employees to report concerns about violations of Securities code of ethics or suspected violations of bye-laws, rules or regulations that govern the Company. It is contrary to the values of **SFEL** for anyone to retaliate against any employee who in good faith report a violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or deliberate attempt of any material/ asset or revenue loss or suspected violation of any regulation governing the Company. An employee who reacts against someone who has reported a violation in good faith is subject to disciplinary action including termination of employment.

2- Key Points of the Policy:

- i- The Whistle blower should promptly report the suspected or actual event to Head of Human Resources.
 - ii- If the Whistle blower is uncomfortable or otherwise unwilling to report to Head of HR , then the Whistle blower can report the event to the Chief Executive Officer.
 - iii- The Whistle blower shall receive no retaliation for a report that was provided in good faith or that had no motive or intention to bring to disrepute the reputation of another employee or the organization.
-

SYED FARAZ EQUITIES LIMITED

Whistle Blower Policy

- iv-** A Whistle blower, who reports in bad faith, shall be subject to disciplinary action including termination from service and legal action where the reputation of the organization and / or members of its staff are tarnished.
 - v-** Anyone who retaliates against the Whistle blower (who reported an event in good faith) will be subjected to disciplinary action including termination from service and legal action.
 - vi-** Head of HR on receiving the reports must promptly act to investigate and resolve the issue in collaboration with Chief Executive Officer.
 - vii-** If the investigation of a report, that was done in good faith and investigated internally, is not to the Whistleblower's satisfaction, then he has the right to report the event to the higher management.
 - viii-** The identity of the Whistle blower shall be kept confidential at all times on a need to know basis except where identity disclosure is required for legal proceedings.
-