

Topline Securities Limited Whistleblowing Policy.

1. General

Topline Securities Limited is a quality conscious Company, therefore employs all available methods and processes to identify fault lines and take timely actions to address these in the larger interest of the Company. The Company is committed to the highest possible standards of honesty, excellence, consistency, compassion, fairness, integrity and accountability. The Company Whistleblowing encourages and enables all concerned to raise serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside.

The Policy applies to all employees, management and the Board, and extends to every individual associated with the Company including employees, clients, and the shareholders etc. They are encouraged and have been enabled to participate without fear of reprisal or repercussions, in confidentiality, under defined reporting channels, with initial reporting to immediate supervisor and where this is impracticable, to report directly to HR.

The Whistleblowing Policy does not apply to employees' career related issues like promotions, transfers, relocations, trainings etc. for which separate procedure exists. Under the Policy, anonymous concerns shall not be taken into consideration.

The objectives, scope and procedures of the Company’s ‘Whistleblowing Policy’ are as follows:

2. Objectives

- 2.1 To encourage confidence in all employees and other associated individuals to question and raise concerns in the interest of Company.
- 2.2 To develop a culture of openness, accountability and integrity.
- 2.3 To provide avenues for confidentiality of concerns raised and allow feedback on corrective measures employed.
- 2.4 To ensure existence of a mechanism that allows a whistleblower to monitor and where required, act against the unsatisfactory proceedings.
- 2.5 To reassure a whistleblower for protection from possible reprisals or victimization.
- 2.6 To enable Management to be informed at an early stage about fraudulent, immoral, unethical or malicious activities or misconduct and take appropriate actions.

3. Scope

The Policy covers following concerns:-

- 3.1 Conduct by anyone, which is an offence/breach of law.
- 3.2 Failure to comply with legal obligations.
- 3.3 Violation / noncompliance of Company’s policies / procedures.

- 3.5 Non Compliance of rules and regulations of the PSX, SECP, NCCPL and CDC.
- 3.4 Health and safety risks, including risks to the public as well as other employees.
- 3.5 Damage to the environment, Company assets and corporate image.
- 3.6 Possible fraud /corruption / incorrect financial reporting with bad intentions.
- 3.7 Illegal use of sensitive company data.
- 3.8 Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right or wrong / unethical.
- 3.9 Miscarriage of Justice.

4. **Confidentiality**

- 4.1 All concerns raised will be treated in confidence and wherever required, every effort will be made to maintain confidentiality of the whistleblower's identity. At the appropriate time, one may however, need to come forward as a witness.
- 4.2 The policy encourages all to believe that disclosure of concerns is in the Company's interest. It however cautions all concerned to not act maliciously or make false allegations. Similarly one must not seek any personal gain through this Policy.

5. **Whistleblowing Unit**

The Whistle Blowing Unit will comprise of the following officials of the Company:-

- 5.1 Head of Internal Audit, Compliance Officer and Company Secretary.
- 5.2 Head of respective division / department as coopted member if not directly involved in the reported concern.
- 5.3 CEO and COO if the matter is of high sensitivity as per their judgment.

6. Procedure

6.1 Raising Concern

- 6.1.1 The employees shall normally raise concerns with immediate supervisor/manager. Depending upon the seriousness/sensitivity of the issues involved, a senior level of management within respective division/department may be approached. If the issue is not addressed at divisional / departmental level or warrants reporting to the higher level, Whistleblowing Unit may be approached. All others may also follow the same procedure to report the concerns.
- 6.1.2 All concerns are to be reported in writing to ensure a clear understanding of the issues being raised. It must contain the background, the nature of concern; relevant dates and timings where possible, the reasons for the concern and the names of individuals against whom the concern is being reported. Concerns can be reported through email at info@Topline.com.pk.
- 6.1.3 In case a concern is against any member of the Whistleblowing Unit itself, the same may be reported directly to the Chief Executive Officer.

6.2 Handling Concern

- 6.2.1 Each concern received by the Whistle Blowing Unit is to be logged and assigned a code that will be used in the subsequent investigation and reporting of the concern.
- 6.2.2 Initial inquiries / assessments will be made by Chief Operating Officer in consultation with other members to determine whether an investigation is appropriate, and the form that it should take. Some trivial concerns may be resolved by agreed action without the need for investigation.

- 6.2.3 An investigation will only be conducted if available information is sufficiently specific and if it contains adequate corroborating evidence to warrant an investigation.
- 6.2.4 The Whistleblowing Unit in consultation with respective head of division / department shall nominate a person either from within the department and/or from any other department to investigate the concern.
- 6.2.5 A person who is investigating any concern under this policy shall be empowered to seek information from the relevant persons and the concerned departments of the Company shall also co-operate with him.
- 6.2.6 The investigation will be preferably completed within thirty (30) days from the lodging of concern.
- 6.2.7 The Whistleblowing unit shall acknowledge receipt to the whistleblower within 07 days of receipt of the concern, with the indication that the matter will be dealt with as per Company policy.

- 6.2.8 At the end of the investigation, a written report that provides the findings, basis of findings and a conclusion is to be submitted to the Chief Executive Officer.
- 6.2.9 Whistleblowing Unit should mutually decide about disposal of the concern and disseminate messages across the Company for avoidance of such incidents in the future.
- 6.2.10 In case of split decision, the case will be referred to the Chief Executive Officer.
- 6.2.11 Records of all whistle blowing concerns, investigations, and reports are to be retained for at least 5 years.
- 6.2.12 The Compliance Officer will be part of the Whistle Blowing Unit in cases of any complaints regarding Non Compliance of rules & regulations of PSX, CDC, SECP, NCCPL and AML regulations

7 False Allegations

Deliberately making a false concern is also an allegation under this Policy and may lead to a disciplinary action against complainant.

8 Disclosure to external bodies

Whistleblower Unit is not allowed to disclose internal concerns to any of the external bodies unless the concern raised involves legal provisions or disclosure is required by law.