



# OPERATIONAL POLICY FRAMEWORK

## WHISTLE BLOWER POLICY

The Chamber of Commerce Code of Ethics requires all its Stakeholders including members of the board of directors, standing committee members, vendors, consultants as well as staff to observe high standards of business and personal ethics in the code of their duties and responsibilities. As representatives of a Chamber, everyone must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all stakeholders to comply with the Code of Ethics and to report violations or suspected violations in accordance with this **Whistleblower Policy**.

Any stakeholder who discovers or suspects such activity should normally raise concerns through Secretary General or put in writing to Chairperson, Finance & Audit Committee or Advocacy / Advisory committee related to the nature of the case which will then be passed on to Chairman of the Board for final resolution.

### **Retaliation**

No stakeholder who in good faith reports a violation of the Code of Ethics shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This **Whistleblower Policy** is intended to encourage and enable stakeholders to raise serious concerns within the Chamber prior to seeking resolution outside the Chamber.

### **Reporting Violations**

The Code of Ethics address the Chamber's open door policy and suggests that stakeholders share their questions, concern, suggestions or complaints with someone who can address them properly. In most cases, Chamber's Compliance Officer i.e. Secretary General is in the best position to address an area of concern, who reports to Chairman of the Board or relevant committee, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when someone is not satisfied having followed the Chamber's open door policy, individuals should contact the Chamber's Compliance Officer directly.

Ideally the following criteria should be followed in raising the concern via email.

Reporting – The whistle blowing procedure is intended to be used for serious and sensitive issues.



# OPERATIONAL POLICY FRAMEWORK

Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to compliance officer.

## **Compliance Officer**

The Chamber's Compliance Officer is responsible for investigating and resolving all reported complaints and allegation concerning violations of the Code and, at his/her discretion, shall advise the executive committee or Chairman of the Board (as applicable).

Reporting may be done through official email [feedback@pajcci.com](mailto:feedback@pajcci.com) / [info@pajcci.com](mailto:info@pajcci.com) or via call on **021 99332677**. For visits or meetings in this context, request can also be shared via our website <http://pajcci.com/VisitorForm.aspx>.

## **Accounting and Auditing Matters**

The Executive Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the executive committee of any such complaint and work with the committee until the matter is resolved.

## **Acting in Good Faith**

Any stakeholder filing a complaint concerning a violation or suspected violation of the Code of Ethics must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Ethics. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct any adequate investigation.

## **Handling of Reported Violations**

The Compliant Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.