

Whistle Blowing Policy



Approved in BOD Meeting held on 20 October 2025

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Manager Recommended by	: Management Committee
headed by CEO	: Mubashar Nabi
Approved by	: Board of Directors, ACT International

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Introduction

The term “Whistle Blowing” is used to describe the proactive approach taken within the Organization by its employees, beneficiaries, and stakeholders to disclose a wrongdoing or malpractice to the appropriate forum within the Organization. This serves as a key element in safeguarding ACT International’s integrity, encouraging and enabling employees to raise concerns rather than overlook issues of concern.

This policy enables staff and other stakeholders to report irregularities, malpractice, or wrongdoing affecting ACT International's reputation, in a responsible and effective manner, without fear of adverse consequences. ACT International recognizes the importance of ensuring transparency in the whistleblowing process, offering accessible reporting channels, and upholding confidentiality and the safety of all whistleblowers.

Objective

The objective of the policy is to establish appropriate and timely handling of the receipt, retention, and treatment of alleged malpractices or misconduct. Furthermore, this will provide a means for a discreet and confidential channel for escalation of concerns without fear of reprisal. This policy aims to ensure that all reporting channels are clearly displayed and easily accessible for staff, community members, and stakeholders to encourage openness and transparency.

Confidentiality & Protection of Whistleblower

WBC encourages staff to blow the whistle if there is a genuine concern that a malpractice has occurred or is occurring. It is, however, expected that the Whistleblower will raise concerns in good faith and without malice, and that the charges contained in their complaint are substantially true. ACT International is committed to maintaining confidentiality and protecting the identity of the whistleblower, ensuring that all parties involved are shielded from potential retaliation or unfair treatment.

Information passed on through whistleblowing will be kept confidential to the extent possible, protecting both the reporting person and the accused from any resultant discrimination or unfair treatment. The reporting channels will be easily accessible and adequately displayed, ensuring all staff and stakeholders are aware of how to raise concerns effectively.

Harassment or Victimization of Whistleblower

This policy provides a discreet and confidential channel for the escalation of genuine concerns without fear of reprisal. Any form of harassment, victimization, or retaliation against a whistleblower is strictly prohibited and will be met with disciplinary action. The policy also affirms the right of the whistleblower to be defended and protected against any negative repercussions, ensuring the safety of those who speak out.

Where a case of false whistleblowing arises, the whistleblower may be subject to disciplinary action

following an investigation into the case.

Procedure - How to Blow the Whistle / Raise a Concern

If someone has a concern about malpractice or any wrongdoing, they are encouraged to report it directly to the HR Manager (Focal Person) using any of the following methods:

- In writing under private and confidential cover to the complaint and feedback mechanism focal point.
- By email at cfm@act-international.org
- By calling at 0092 51 8312826, or +92 311 1999899, to the complaint and feedback mechanism focal point.

Each concern received by the WBC will be logged and assigned a code used for investigation and reporting. The WBC will acknowledge receipt of the concern within seven (7) days and provide a clear communication on the course of action being taken. The policy ensures that no individual will be penalized or treated unfairly for raising a legitimate concern, defending the rights of whistleblowers throughout the process.

Possible Instances of Malpractices

Non-exhaustive lists of instances of malpractices that may trigger whistle blowing are cited below for reference which may be amended from time to time.

1. Breach of ACT International's Policies / Manuals or any action that is unlawful or may damage the reputation of ACT International.
2. Fraud or deception with the intention of gaining an undue advantage, avoiding an obligation or causing loss to another party.
3. Forgery or alteration of financial / non-financial documents or account belonging to ACT International.
4. Direct or indirect involvement in misappropriation of funds, supplies or other assets.
5. False reporting / representations of fact, whether by words or by conduct, to other stakeholders.
6. Taking or giving bribes or any illegal gratification.
7. Disclosure of confidential information.
8. Matters which give rise to harassment, sexual abuse and exploitation, discrimination or other unfair employment practices.
9. Any act in violation of Safety Health & Environmental standards applicable to the business.

Additional Safety & Transparency Measures:

To ensure **clarity and transparency**, the policy outlines the following:

- **Adequate display of reporting channels:** All employees and stakeholders will be made aware of multiple, easily accessible channels for reporting concerns. These channels will be prominently displayed and communicated through regular training and awareness programs.

- **Staff and community awareness:** Regular training sessions will be conducted to ensure all staff, vendors, and community members are familiar with their rights under this policy, understand the reporting process, and are aware of the safeguards in place to protect whistleblowers.
- **Rights of the whistleblower:** ACT International will ensure that whistleblowers' rights are defended, and no retaliation, discrimination, or victimization will be tolerated. All whistleblowers will be provided with legal and professional support throughout the reporting process.

ACT INTERNATIONAL

Whistleblowing Form

For office use only	
Date	
Ref. No	
Received by	

1. WHISTLEBLOWER / REPORTER'S CONTACT INFORMATION	
NAME	
CONTACT NUMBER	
E-MAIL ADDRESS (optional)	
ADDRESS	

2. ACCUSED / SUSPECT'S INFORMATION	
NAME	
DESIGNATION	
ORGANIZATION (optional)	
CONTACT NUMBER (optional)	
E-MAIL ADDRESS (optional)	
ADDRESS (optional)	
ANY OTHER DETAILS ABOUT SUSPECT	

3. COMPLAINT TYPE
<p> <input type="radio"/> Sexual Abuse and Exploitation <input type="radio"/> Corruption and bribery <input type="radio"/> Procurement related fraud <input type="radio"/> Misuse of ACT resources / authority <input type="radio"/> Failure to comply with requirements related to financial disclosure and/or local laws <input type="radio"/> Misrepresentation of facts <input type="radio"/> Breach of funding agreement with ACT <input type="radio"/> Any other </p>
4. BRIEF DETAILS OF THE COMPLAINT



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Resolution of the Board of Directors

The Board of Directors has passed this Resolution to endorse the amendments in policies. The resolution was duly passed by circulation on 20th October 2025.

RESOLVED THAT:

Aiming Change for Tomorrow (ACT) International will amend three policies to include the PSEA (Prevention of Sexual Exploitation and Abuse) component. In order to ensure a safe workplace, it is essential to implement these amendments in the following policies:

1. HR Policy
2. PSEA Policy
3. Whistleblowing Policy

The Board of Directors has reviewed and endorsed the amendments to all three policies, ensuring they align with the necessary requirements.

Duly signed by Board of Directors

S. No	Name	Status	CNIC	Specimen Signature
1.	Farzana Yaqoob	Chairperson	37405-5480398-2	
2.	Prof. Farkhanda Aurangzaib	Member	54400-4895286-0	
3.	Dr. Bushra Aizaz	Member	82203-1135528-6	
4.	Mr. Muhammad Javid Malik	Member	61101-0488964-3	
5.	Dr. Haris Ahmed	Member	37405-4202234-3	
6.	Dr. Zaineb Hafeez	Member	37301-3531962-6	
7.	Brigadier (Rtd.) Hamid Abdullah	Member	35201-2031694-9	
8.	Mr. Mubashar Nabi	Founder President/Member	61101-9146195-7	
