

ANTI CORRUPTION/FRAUD POLICY

JUNE 2018

BALUCHISTAN EDUCATION ENDOWMENT FUND (BEEF)

A COMPANY REGISTERED UNDER SECTION 42 OF THE REPEALED COMPANIES
ORDINANCE 1984

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1. TITLE OF DOCUMENT:

This document will be titled as "Balochistan Education Endowment Fund Anti-Corruption/Fraud Policy"

2. APPLICABILITY:

This policy will be applicable to all the employees of BEEF including executive Management. This policy will come into effect after the approval and consent of Board of Directors.

Chief Executive Officer (CEO) BEEF reserves the right to amend or modify these rules whenever deemed necessary as per applicable rules and regulations after intimating Board of Directors.

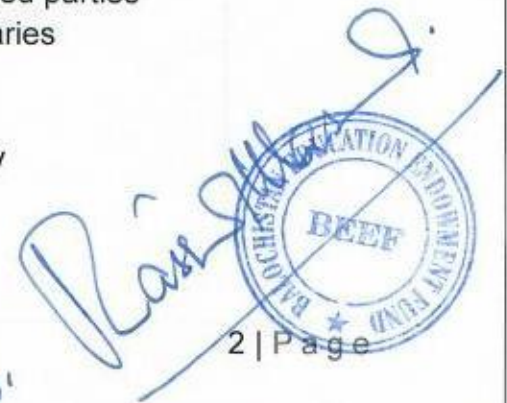

3. PURPOSE OF THIS POLICY

The main objective of formulating this policy is to prevent or minimize any kind of actual or potential Corruption/Fraud and further provide a confidential channel to individuals and stakeholders to report any irregularities, wrongdoing or malpractice affecting BEEF and its reputation.

4. TYPES OF CORRUPTION

Corruption is an intentionally deceptive action designed to provide wrongdoer with an unlawful gain or to deny the right of a victim. Corruption involves the false representation of facts, whether by intentionally withholding precious information or providing false statements to another party for the purpose of gaining something that may not have been provided without the deception. Corruption may be committed by individual or group of individuals. There are many types of Corruption through which individual can obtain personal advantage. Some examples of Corruption but are not limited to are demonstrated below

- Bribes, Kickbacks or any other corrupt Payments
- Breach of BEEF's Policies and Procedures
 - Matters which may give rise to Harassment, Discrimination or any other form of unfair employment.
- Exchanging gifts with Scholars, Suppliers or other related parties
- Intentional delay in payment of scholarship to Beneficiaries
- Sharing of Confidential Information for personal gain
- Misuse of BEEF's asset
- Theft or Misappropriation of BEEF's funds and property

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5. CONSEQUENCES OF CORRUPTION

Keeping in view the severity of situation, BEEF's Management reserves the right to carry out any one or cumulative actions against actual or potential corruption

- a) Verbal Warning;
- b) Written Warning;
- c) Reassignment of task, duty or job;
- d) Deferment of or declaring ineligibility for specific salary increase for a certain period;
- e) Recovery from pay against the whole or part of any pecuniary loss caused to BEEF by the employee
- f) Sending on the administrative leave
- g) Immediate Termination/ Dismissal from Employment
- h) With approval of Chief Executive Officer (CEO), legal action may be taken against the alleged person(s), which may include one or more of the following:
 - i) Filing of suit for forgery/fraud or criminal complaint in the appropriate court of law;
 - ii) Filing of case to the NAB;
 - iii) Publication of the offence/fraud committed by the staff member in the leading newspaper for public information
 - iv) Immediate inclusion of name of the concerned staff member in the "Exit Control List"

6. COMMUNICATING CORRUPTION BY WHISTLE BLOWING

Whistle Blowing is a method through which BEEF employees and stakeholders feel free and safe towards disclosure of any corruption or wrongdoing. BEEF always intends to provide secure and independent mechanism through which any actual or potential corruption can be communicated to BEEF's Management in an efficient manner. In this regard, following systems are installed at BEEF

- Complaint Box is placed outside Chief Executive Officer (CEO) which is managed by Chairman BEEF.

CEO


- Written Complaint can be launched under of Private and Confidential cover and can be sent directly of Head of Internal Audit Department at Block No.9, Room No.13 Balochistan Civil Secretariat Quetta
- All concerns can also be sent through email at whistleblow@beef.org.pk or through fax #081-9202096 or through visiting BEEF's website www.beef.org.pk
- Direct Contact with Head of Internal Audit Department can be made on Landline #081-9204430

BEEF committed to this policy and encourages its staff and other stakeholders to raise their voice against genuine potential or actual Corruption. Moreover, it is expected that Whistle Blower raise the concerns in good faith and without any malice and that the charges contained in his/her complaint are based on true ground. All the information receives through whistleblowing will remain confidential and whistleblower will be protected against unfair treatment from his/her colleagues and or management as a consequence. However, any anonymous complaints will not be entertained by Whistle Blowing Committee (WBC).

7. WHISTLE BLOWING COMMITTEE

There will be a Whistle Blowing Committee (WBC) which is headed by Head of Internal Audit Department while other members are nominated by Chief Executive Officer (CEO). Similarly, Head of Internal Audit Department and Manager Administration will review the reasonableness and adequacy of any wrongdoing reported and may recommend Investigation. The Committee may also call the accused after initial investigation. The CEO will have the final authority to decide the final course of action. If the complaint/allegation is against any member of the Committee than such matter will be communicated to CEO and alternative will be appointed accordingly. If the complaint/allegation is against Chief Executive Officer (CEO) than in these circumstances Committee will present its findings to Board of Directors and other members of Committee will also be nominated by Board Members accordingly.

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