



**Pakistan Oxygen Limited
(Formerly Linde Pakistan Limited)**

Whistleblowing Policy

Objectives:-

We are committed to conduct our business in most transparent manner and are committed to work with all stakeholders including but not limited to our employees, supply chain, customers and shareholders in a manner which is compliant with legal and ethical values.

This policy is being issued to make sure that all stakeholders are able to make fair and prompt disclosure of circumstances where it is genuinely believed that the Company's business is not being carried out in an appropriate manner or in violation of applicable laws, and code of ethics of the Company.

The Company's Whistleblowing Policy encourages and enables all concerned to raise serious concerns within the Company rather than overlooking a problem or 'blowing the whistle' outside.

Scope of the Policy:-

The policy covers the following concerns:-

- Conduct by anyone, which is an offence/breach of law.
- Failure to comply with legal obligations.
- Violation / noncompliance of Company's policies / procedures.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment as a consequence of Company's operations, Company assets and/or corporate image.
- Possible fraud /corruption / incorrect financial reporting with malafide intentions or other unethical practices.
- Illegal use of sensitive company data.
- Actions which are unprofessional, inappropriate or in conflict with a general understanding of what is right or wrong / unethical.
- Miscarriage of Justice.

The Whistleblowing Policy does not apply to employees' career related issues like promotions, transfers, relocations, trainings etc. for which separate procedure exists.

Reporting Mechanism:-

- Employees are encouraged in such circumstances to share and discuss this with their line managers before considering the use of whistleblowing procedures to air their concerns. However, in case it is not possible for



them or they do not wish to share or discuss their concerns with their line managers then the employee should raise the matter through the whistleblowing procedure outlined below.

- Reporting can be made by employees / other parties directly via email to compliance.hr@pakoxygen.com for all concerns while complaints or concerns raised against the Chief Executive Officer and/or his direct reports shall exclusively be raised at compliance.codeofethics@pakoxygen.com (this email is of Chairman Board Audit Committee).

Confidentiality

These email addresses are a link to a system which is being created to ensure complete confidentiality for the person who raises the concern, to remove any fear of retaliation for raising a concern while an independent body thoroughly investigates the concern so raised.

This responsibility is being vested on independent third party, i.e. Chairman Board Audit Committee (BAC) who is an independent director of the Company. Reporting of all concerns relating to Chief Executive Officer and/or his direct reports shall exclusively be raised to the Chairman BAC at compliance.codeofethics@pakoxygen.com while concerns relating to other employees may be addressed to the Head of Human Resource (HR) at compliance.hr@pakoxygen.com or at the option of the complainer to the Chairman BAC.

Once a concern is received, it will be logged on a dedicated confidential database, given a unique identifying number. The Chairman BAC considering severity and criticality of the concern, shall decide as to whether the concern be investigated internally by the Company or be dealt with by the audit firm as engaged by the Company for its internal audit function. In case of concerns reported to Head of HR, he shall seek guidance of the Chairman BAC to deal with all the concerns reported to him.

All whistle blowing cases shall be presented to the Board Audit Committee for its information and consideration as part of its quarterly review.

This system shall also be available for anonymous reporting through which concerns may be reported via email at the given email address or by post at the PO Box address of the Company marked to the Chairman BAC as “Strictly Confidential” without mentioning their identity or name etc.

All the reported concern shall be responded back to the reporter in all cases whether or not the concerns raised were substantiated or not.



The same system will also be available to all external stakeholders. Such a whistleblowing system will ensure that all concerns of internal and external stakeholders are investigated fairly and quickly and with fullest confidentiality. As a policy, the Company will not tolerate retaliation against any concern that is reported in good faith.

Protection

This Policy is designed to offer protection to those who disclose a complaint, provided this disclosure is made in good faith. Disciplinary action will be taken against those who engage in retaliatory conduct. Whistleblowers should be given an opportunity to report any and every retaliatory conduct towards them and, hence, monitoring the welfare of all employees and providing a safe environment to the whistleblowers is of paramount importance.