

Whistleblowing & Grievance Procedure

Confidential reporting of misconduct, discrimination, harassment, corruption and information security concerns, with remediation

Document No.	TL-SOP-GRV-010	Revision	00
Effective date	01-10-2026	Next review	30-09-2027
Policy owner	Ethics Officer	Approved by	Chairman
Scope	Employees, former employees, job applicants, contractors, suppliers, customers and any other stakeholder of Trade Linx	Classification	Public – available to all stakeholders

1. Purpose

This procedure gives everyone a safe way to raise concerns about wrongdoing at Trade Linx and makes sure concerns are investigated fairly and that harm is put right. It supports the Human Rights, Labour & Working Conditions Policy (TL-POL-HR-020), the Business Ethics & Anti-Corruption Policy (TL-POL-ACP-010) and the Information Security & Data Protection Policy (TL-POL-ISM-010).

2. What can be reported

- Discrimination, sexual harassment, bullying or abuse
- Bribery, corruption, fraud, conflicts of interest, money laundering
- Information security incidents, data leaks or misuse of personal data
- Health and safety dangers, environmental violations
- Unfair treatment regarding pay, hours, leave or other working conditions
- Breaches of the Supplier Code of Conduct

3. Reporting channels (accessibility)

Channel	Details
Dedicated email	akhtar@tradelinx.pk – read only by the Ethics Officer (Akhtar Ali) and the Chairman
Phone / WhatsApp	+92 321 4777002 – Ethics Officer (Akhtar Ali), in Urdu or English
Written / drop box	Sealed letter marked "Confidential – Ethics Officer" to 16-J Johar Town, Lahore, or the locked suggestion box near the staff room (opened weekly by the Ethics Officer)
In person	Ethics Officer, any manager, or for harassment any member of the Harassment Inquiry Committee
External	Harassment: Ombudsperson Punjab for Protection against Harassment of Women at the Workplace. Corruption: National Accountability Bureau.

Reports can be made **anonymously**. The channels are displayed on the notice board in Urdu and English, explained at induction, printed in the Supplier Code of Conduct, and published on www.tradelinx.pk.

4. Confidentiality and non-retaliation

- The identity of the reporter and the content of the report are shared only with people who need to know to investigate. Records are kept in a locked cabinet / restricted folder.

- Trade LinX guarantees **no retaliation** (dismissal, demotion, pay cut, threats, isolation) against anyone who reports in good faith or helps an investigation. Retaliation is itself a serious disciplinary offence.
- If the complaint concerns the Ethics Officer, it goes directly to the Chairman; if it concerns the Chairman, to the company's external auditor, A. Haider & Co., Chartered Accountants, Lahore.

5. Handling steps and timelines

#	Step	Timeline	Details
1	Acknowledge	3 working days	Ethics Officer records the case in the grievance register and confirms receipt (if the reporter is known).
2	Assess	7 days	Decide which process applies (harassment → Inquiry Committee; others → Ethics Officer) and whether interim protection is needed, e.g. separating the parties.
3	Investigate	30 days	Fair and impartial; both sides are heard; evidence is documented.
4	Decide	—	Findings and proposed actions approved by the Chairman.
5	Feedback	—	Reporter and the affected person are told the outcome as far as confidentiality allows.
6	Close and monitor	3 months after	Check the remedy worked and no retaliation happened; close the case.

6. Remediation for victims

Where a complaint is upheld, Trade LinX provides a remedy that is:

- Proportionate** to the harm: e.g. apology, reinstatement or correction of pay/promotion decisions, back-pay, paid leave, counselling or medical costs, transfer of the offender (not the victim), and disciplinary action against the offender from warning to dismissal.
- Transparent:** the victim is told what action was taken and why, and can appeal to the Chairman within 15 days.
- Monitored:** the Ethics Officer meets the victim after 1 and 3 months to check that the remedy is effective and there is no retaliation; results are recorded in the register.

7. Records and reporting

The grievance register records: date, channel, category, status, time to close and outcome (without names in reports). The number of reports by category and the number of confirmed corruption and information security incidents are reported quarterly to the Chairman and yearly in the Sustainability KPI Report.

8. Review

The Ethics Officer **Akhtar Ali** reviews this procedure every year, including a check of whether the channels are known and trusted (question in the annual employee survey).

Approval

This document was approved by the Chairman of Trade Linx on 01-10-2026 and is effective from that date. It is communicated to all employees and relevant stakeholders, applies until superseded and is reviewed at least annually.

Prepared by: Ethics Officer

Approved by	Signature and company stamp	Date
Chairman, Trade Linx	Approved and signed by the Chairman – signed original held at Trade Linx Head Office, Lahore	01-10-2026

Revision history

Rev.	Date	Description of change	Approved by
00	01-10-2026	First issue.	Chairman