



# NATIONAL INSURANCE COMPANY LTD.

## Employees' Union (C.B.A)

(REGISTERED WITH NIRC UNDER REGISTRATION NO. 2/76)

Ref. No. NICL/EU/13/Manag/2024

Date: 19-04-2024

To

Transparency International Pakistan,  
Plot #.72-F/2, 1<sup>st</sup> Floor, 9th Street, J/ Commercial  
St, Phase VII, Defence Housing Authority,  
Karachi.

Subject: False, Frivolous and Baseless Complains lodge by Mr. Zubair Soomro and others against the CBA and of NICL.

Dear Sir,

We want to draw your attention towards the false and frivolous complaints lodged by Mr. Zubair Ahmed Soomro and Mr. Moula Buksh on the letterhead of NICL Employees Union (CBA) and falsely claiming themselves as President and General Secretary of the NICL Employees Union (CBA).

At the very outset, it is submitted that Mr. Zubair Ahmed Soomro and Mr. Moula Baksh are no more office bearers of the NICL Employees Union (CBA) and using the letterhead of NICL Employees Union without lawful authority. Kindly note that as result of election of NICL Employee Union, held on 25-03-2024, we have been elected as President and General Secretary of the NICL Employees Union.

The present complaint is a part of a series of false and frivolous propaganda initiated by Mr. Zubair Ahmed Soomro and Mr. Moula Buksh, before their dismissal to blackmail the management of NICL to get the benefits for which they were not entitled and also after dismissed of their services on 25.08.2023 to pressurize the management to get reinstated into the service of NICL. They are continuously pressurizing the management on the basis of personal enmity.

On account of the violent activities of Mr. Zubair Ahmad Soomro and Mr. Moula Buksh, the Company has had serious interruptions in its smooth functioning. Their conduct at all times has not only been in negation of their duties as provided in the Industrial Relations Act, 2012.

That during service in NICL, Mr. Zubair Ahmed Soomro and Mr. Moula Buksh, with intent to cause disobedience on the part of the workforce, used derogatory language against the Management of the Company during a General Body Meeting to instigate others to create disturbance in the office premises of NICL. Thereby they have attempted to create an intimidating work environment for the employees of the Company. However, failing to meet the desired target of having their unlawful demands granted, which are on principle being resisted by the Management and even otherwise matter was pending before the Deputy Registrar, NIRC, they had initiated a defamatory campaign against the Management.



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Before dismissal of his service, Mr. Zubair Ahmed Soomro, Mr. Moula Bakhsh Bhagat and others harassed, threatened and abused the senior officials of the Company from time to time. Consequently, an FIR No. 77 of 2024, dated 20.02.2024 was registered against them, which is pending in the Court of Law. Mr. Soomro is currently also facing a case of sexual harassment lodged by a female employee of the Company before the Federal Ombudsman for Protection against Harassment of Women at Workplace.

That on the issuance of the Show Cause Notices against the numerous instances of gross misconduct by Mr. Soomro, he instead of mending his behavior, he started issuing false and frivolous complaints so that he can continue to recklessly exploit the management for his own ill gains.

As a result of independent and transparent departmental inquiry, Mr. Zubair Ahmad Soomro and Mr. Moula Baksh were dismissed from the services of NICL on 25.08.2023. They have approached Court of Law (NIRC) against their dismissal of services, which is pending adjudication. At the same time they have initiated an unending campaign of complaint before various forums to pressurize and compel the management to bargain and settle the issues with them.

Although they were dismissed from the service of NICL on 25-08-2023 and they were no more office bearer of the NICL Employees Union (CBA), in October-2023, they filed a Petition / Case No. 13 (214) / 2023 and submitted fake election's results, which was never held or conducted. On the basis of said false petition and fake election's results he tried to obstruct the process of fair and transparent election of NICL Employees Union.

Under the orders of NIRC Islamabad Bench, the election of NICL Employees Union (CBA) was conducted on 25-03-2024 in the premises of NICL Building, Karachi. As a result of election we have been elected as office bearers of the CBA. Even now once again he has submitted a fake union election's result through a false petition filed before NIRC Islamabad Bench.

During the service in NICL, he remained grossly involved in receiving kickbacks from the members of the union for using his influence and pressure against the management to get approved various loans and other benefits in their favour. The Both are also involved in embezzlement of union's funds.

In view thereof, it is requested that no heed may be paid to such false and baseless assertions and that we, the true representatives of the employees (workers) of NICL say that the management of NICL is acting in accord with the law to keep the morale of the Company high.

Yours' sincerely,

  
**Waqar Ahmed**  
President CBA

  
**Ali Imran**  
Vice President, CBA

  
**Raza Ali**  
General Secretary, CBA

  
**Raja Wajid Hanif**  
Joint Secretary CBA

  
**Ali Akbar**  
Finance Secretary, CBA

  
**Imran Khan**  
Publicity Secretary, CBA