



PG 526

WHISTLEBLOWING POLICY

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INTERNAL	<ol style="list-style-type: none">1. PG 5252. GPA Dasar Perkhidmatan 103. Whistleblowing FAQ Appendix 14. Anti-Bribery and Anti-Corruption Policy5. Any Other Relevant Document
EXTERNAL	

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VERSION RECORDS

Date	Version	Reference	Remarks
30/08/2024	1.0	<i>Circular (Memo) General (GE) No. 50/2024</i>	GPP/GPO Transformation Exercise Formerly known as GPP169

1.0 POLICY

1.1 Introduction

1.1.1 This document sets the whistleblowing policy (hereinafter referred to as the “Policy”) for all of the Bank’s employee and any person within the definition stated under Para 1.4.

1.1.2 The Policy is developed taking into consideration the legislative requirements under the Whistleblower Protection Act 2010, the requirement of BNM Corporate Governance Policy (BNM/RH/PD 029-9) dated 3rd August 2016 and BNM Guidelines on Corporate Governance for Development Financial Institutions dated 19th November 2011.

1.1.3 The Policy is to be read together with:

- a) The Bank’s **Fraud Management Framework**;
- b) The Bank’s Code of Business Conducts and Ethics;
- c) **Anti-Bribery and Anti-Corruption Policy**;
- d) Whistleblowing FAQ (**Appendix 1**);
- e) Any other relevant documents.

1.1.4 Compliance with Law and Regulations

This policy is to be complied at all times and subject to laws and regulations of Malaysia. In the event of any conflict or inconsistency between the provisions of the Policy and the laws and regulations of Malaysia, the latter shall prevail.

1.2 Policy Statement

The Bank is committed to the highest standard of integrity and accountability in the conduct of its affairs, businesses and operations. In achieving this standard, the Bank is further committed to provide Employee or Person with the ability to confidentially report their concerns of Improper Conduct relating to any Employee or Person without fear or risk of reprisal. This Policy sets out avenues for legitimate concern to be objectively investigated, addressed and that appropriate measures are taken in response.

1.3 Objective of The Policy

1.3.1 To protect the values of transparency, integrity, impartiality and accountability within the Bank.

- 1.3.2 Sets out avenues for legitimate concerns to be objectively investigated and addressed via a structured and effective reporting channel.
- 1.3.3 To clearly indicate the parties to whom concerns can be escalated within the Bank and ensure that all Employees or Person within the definition of this Policy are made aware of other avenues for whistleblowing to regulators or Law Enforcement Agencies.
- 1.3.4 To allow Employee or Person to raise concerns about illegal, unethical or questionable practices in confidence without the risk of reprisal or Detrimental Action within the Bank.

1.4 Definitions

Phrase	Definition
Anonymous Whistleblower	Means any person who makes a disclosure of suspected, potential or actual, current or past Improper Conduct (ie: illegal / fraudulent /unethical / questionable practices) to the Bank without disclosing his / her identity.
Bank	Means Bank Kerjasama Rakyat Malaysia Berhad including all its subsidiaries.
BOD	Means Board of Directors and Chairman of the Bank.
Designated Recipient	Means member of IEC 1. Senior Vice President, Fraud & Corporate Integrity 2. Chief People Officer 3. Chief Risk Officer 4. Chief Compliance Officer 5. Chief Internal Audit
Detrimental Action	Includes:- a) Action causing injury, loss or damage; b) Intimidation or harassment; c) Interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person's employment, career, profession, trade or business or taking of disciplinary action; and d) A threat to take any of the actions referred to under item (a) to (c).
Employee	Means individual employed by the Bank either on permanent, contract, temporary, on assignment, or secondment basis.

Phrase	Definition
Fraud & Corporate Integrity (FRCI)	Means the responsible sector within the Bank which handles disclosures concerning Improper Conduct and having its responsibilities and obligations set out in the Bank's policy, procedures and standard operating procedures.
Good Faith	Means a reasonable belief or honest intent to act without taking an unfair advantage over another person even when some legal technicality is not fulfilled.
IEC	IEC - Means Information Evaluation Committee which was established to assist the Bank's Management in fulfilling its statutory and fiduciary responsibilities in relation to Whistleblowing Disclosure.
Improper Conduct	Means any conduct which if proved, constitutes a disciplinary offence under the Bank Code of Business Conduct and Ethics (COBCE) or a criminal offence punishable under the laws of Malaysia.
Person	Means Bank's Board of Directors, vendors, customer, business partners, suppliers and contractors (where applicable)
Responsible Parties	Persons or Departments within the Bank responsible in conducting any inquiry or investigation on the disclosure.
Whistleblower	Means any Employee or Person who makes a disclosure of suspected, potential or actual, current or past illegal or Improper Conduct in good faith to the Bank's available reporting channels.
Whistleblowing	Means a deliberate, voluntary disclosure or reporting of an individual or organizational malpractice by employee or any person (who has privileged access to information) on an actual (past or present) or suspected Improper Conduct within the Bank based on his or her reasonable belief.

1.5 Scope of The Policy

- 1.5.1 This Policy applies to the Bank's Employee and any Person within the definition of this Policy. This policy does not apply to grievances concerning an Employee terms of employment and such matter shall be dealt with in accordance with the Bank Human Resource guidelines and policies. Should it be determined during the preliminary **assessment** that the matter disclosed does not fall within the scope of this Policy, such matters will be transferred and dealt with by the appropriate personnel of the relevant department for appropriate process to be taken.
- 1.5.2 Nothing in this Policy shall prohibits the Employee or Person from making disclosures of Improper Conduct to the **Law** Enforcement Agencies, prior or after such disclosures were made to the Bank.
- 1.5.3 However, it is to be noted that Whistleblower making disclosures of Improper Conduct to the **Law** Enforcement Agencies pursuant to the Whistleblower Protection Act 2010 shall be handled externally by the relevant authorities in accordance with the relevant legislation and are independent of the process and procedures described in this Policy.

1.6 Requirement of Good Faith

- 1.6.1 Whistleblower who intends to lodge any disclosure of Improper Conduct must ensure that the disclosure is made in Good Faith. The disclosure must be supported with a reasonable grounds or justification for believing such Improper Conduct has occurred or will occur and that the action is made for the best interest of the Bank and not for personal gain.
- 1.6.2 The element of Good Faith shall be deemed lacking if the following elements exist:
- a) The Whistleblower himself / herself has participated in the Improper Conduct disclosed;
 - b) The Whistleblower willfully made in his / her disclosure of Improper Conduct a material statement which he / she knew or believed to be false or did not believe to be true;
 - c) The disclosure of Improper Conduct is frivolous or vexatious;
 - d) The Whistleblower does not have personal knowledge or a factual basis for the disclosure of Improper Conduct;
 - e) The disclosure of Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
 - f) Where there are any other circumstances that indicate the disclosure has been made with malicious intention, ulterior motive or for personal gain.

1.7 Protection to Whistleblower

- 1.7.1 The Whistleblower's identity will be accorded with protection of strict confidentiality unless otherwise required by law. The Whistleblower will be protected from Detrimental Action within the Bank as consequence of his/her disclosure. The Bank

shall not tolerate Detrimental Action against the Whistleblower who has made disclosure in Good Faith even if the investigation subsequently finds them to be untrue.

- 1.7.2 The Bank considers adverse or Detrimental Action against Whistleblower as a serious Improper Conduct under the Bank's Code of Business Conduct And Ethics and such action shall be subject to disciplinary action including but not limited to legal action, where applicable.

1.8 Revocation of Protection to Whistleblower

- 1.8.1 Any person who has not acted in Good Faith shall not be entitled to any protection under this Policy. The protection under this Policy shall be automatically revoked if the disclosures made does not fulfilled the elements of Good Faith as stated under Para 6 above.
- 1.8.2 If the allegations are proven to be malicious or founded on bad faith, parties responsible may be subject to appropriate action such as disciplinary action including but not limited to legal action, where applicable.

1.9 Anonymous Disclosure

- 1.9.1 Any Employee or Person may choose to disclose the concern of Improper Conduct anonymously. However, the Bank reserves it's absolute discretion whether to proceed with investigation or otherwise. Factors, amongst others, to be considered includes seriousness of the concerns, credibility of the allegations, and whether the concerns can realistically be investigated from sources other than from the whistleblower.

1.10 Administration

- 1.10.1 **FRCI** shall administer all matters pertaining to the implementation of this Policy. The administration will include and not limited to establishing relevant Standard Operating Procedures to support the effective implementation of this Policy, creating awareness program and working culture based on the values of integrity, transparency, impartiality and accountability throughout the Bank.

1.11 Reporting Channel

- 1.11.1 Any Employee or Person are encouraged to utilize one of the Bank's multiple channels for reporting concern of Improper Conduct such as follows:
- a) Report in writing using the Whistleblowing Form (**Appendix 2**) direct to the Bank's Designated Recipient.
 - b) Email to whistle@bankrakyat.com.my
 - c) In person direct to **any member of IEC**

2.0 STANDARD OPERATING PROCEDURE (SOP)

2.1 Definition

Phrase	Definition
BOD	Means Board of Directors and Chairman of the Bank.
CEO	Chief Executive Officer of Bank Rakyat
Confidential Information	<p>a) Information in relation to identity, employment, residential address, office address or his/her whereabouts/location of:</p> <ol style="list-style-type: none"> Whistleblower; and Person against whom a Whistleblower has made a disclosure of Improper Conduct <p>b) Information disclosed by a Whistleblower; and</p> <p>c) Information that, if disclosed, may cause detriment to any Person.</p>
Designated Recipient	<p>Means member of IEC</p> <ol style="list-style-type: none"> Senior Vice President, Fraud & Corporate Integrity Chief People Officer Chief Risk Officer Chief Compliance Officer Chief Internal Audit <p>A member who has interest or conflict in the case shall make a declaration and shall abstain from participating in the deliberation and decision relating to the case.</p>
Detrimental Action	<p>Includes: -</p> <ol style="list-style-type: none"> Action causing injury, loss or damage. Intimidation or harassment. Interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person's employment, career, profession, trade or business or taking of disciplinary action. <p>A threat to take any of the actions referred to item (a) to (c).</p>
Fraud and Corporate Integrity (FRCI)	Means the responsible sector within the Bank which handles disclosures concerning Improper Conduct and having its responsibilities and obligations set out in the Bank's policy, procedures and standard operating procedures.
IDVN	Means Integrity Detection and Verification which is the dedicated department within FRCI sector that handles administration of complaint management and maintain Whistleblower Register.
IEC	Means Information Evaluation Committee which was

Phrase	Definition
	established to assist the Bank's Management in fulfilling its statutory and fiduciary responsibilities in relation to Whistleblowing Disclosure .
Improper Conduct	Means any conduct which if proved, constitutes a disciplinary offence under the Bank Code of Business Conduct and Ethics (COBCE) or a criminal offence punishable under the laws of Malaysia.
Investigation Officer	Any internal individual authorized to investigate Improper Conduct.
Law Enforcement Agencies	<ul style="list-style-type: none"> a. Any ministry, department, agency or other body set up by the Federal Government, State Government or local government including a unit, section, division, department or agency of such ministry, department, agency or body, conferred with investigation and enforcement functions by any written law or having investigation and enforcement powers; b. Body established by a Federal Law or State law which is conferred with investigation and enforcement functions by that Federal law or State law or any other written law; or c. A unit, section, division, department or agency of a body established by a Federal law or State law having investigation and enforcement functions.
Non-Executive Director	Designate a non-executive director to be responsible for the effective implementation of the Whistleblowing Policy (<i>BNM Guideline on Corporate Governance: Part D-item 18.5 Whistleblowing Policy</i>).
Senior Management Officer	All Senior Vice President, Chiefs, Deputy Chief Executive Officer.
Whistleblower	Means any Employee or Person who makes a disclosure of suspected, potential or actual, current or past illegal or Improper Conduct in good faith to the Bank's available reporting channels. Whistleblower's identity shall not be disclosed. Whistleblowers is protected under the Whistleblower Protection Act 2010.
Whistleblowing	Means a deliberate, voluntary disclosure or reporting of an individual or organizational malpractice by employee or any person (who has privileged access to information) on an actual (past or present) or suspected Improper Conduct within the Bank based on his or her reasonable belief.
Witness	Witness is a person who can testify (to an organization or the Court) based on his or her knowledge or involvement in a transaction of Improper Conduct. A person's potential to be a witness will be identified during an investigation to

Phrase	Definition
	prove the guilt of a perpetrator of the crime.

2.2 Objective of The Procedure

- 2.2.1 To protect the values of transparency, integrity, impartiality and accountability within the Bank.
- 2.2.2 Sets out avenues for legitimate disclosures to be objectively investigated and addressed via a structured and effective reporting channel.
- 2.2.3 To clearly indicate the parties to whom disclosures can be escalated within the Bank and ensure that all Employees or Person within the definition of this Policy are made aware of other avenues for whistleblowing to regulators or Law Enforcement Agencies.
- 2.2.4 To allow Employee or Person to raise disclosures about illegal, unethical or questionable practices in confidence without the risk of reprisal or Detrimental Action within the Bank.

2.3 Review and Monitoring

- 2.3.1 **The Fraud and Corporate Integrity (FRCI)** shall maintain a register for all disclosures made under this Policy. All documents obtained pertaining to disclosures shall be considered “Confidential” and be stored securely under the custody of the **FRCI** for seven **(7)** years or longer as may be decided by the **FRCI**.
- 2.3.2 The **FRCI** shall, on a quarterly basis, update the **Board of Directors (BOD)** on statistics pertaining to the disclosures such as number of disclosures received to date and nature of such disclosures, status of investigations, and other relevant updates.
- 2.3.3 This Policy shall be reviewed to reflect any changes in relevant laws and guidelines. Any proposed changes to this Standard Operating Procedures (SOP) shall be prepared by the **FRCI**. As a minimum, this Policy shall be reviewed on an annual basis.

2.4 Reporting Procedures & Channels

2.4.1 As stated in the Whistleblowing Policy (GPP 169), any Employee or Person are encouraged to utilize one of the Bank's multiple channels for reporting concern of Improper Conduct such as follows:

- a) In person direct to **any member of IEC**; or
- b) Email to whistle@bankrakyat.com.my; or
- c) Bank Rakyat Corporate website (Step 1 – Click Corporate Info; Step 2 – Click Whistleblowing Policy; Step 3 – Click Whistleblowing e-form or whistle@bankrakyat.com.my).

2.4.2 Clause 1.5.2 Whistleblowing Policy (GPP 169) stated nothing in this Policy shall prohibits the Employee or Person from making disclosures of Improper Conduct to the **Law** Enforcement Agencies, prior or after such disclosures were made to the Bank.

2.4.3 Who can Disclose:

Any of the following Persons can make a disclosure:

- i. The Bank's employees, including employees on permanent, contract, temporary assignment or secondment basis, including agents and consultants working for the Bank.
- ii. Members of the public who are natural persons.

2.4.4 What to Disclose:

Improper Conduct constitutes one or more by any Persons in the conduct of Bank's business or affairs such as bribery or corruption (If a Person is unsure whether a particular act or omission constitutes a wrongdoing under COBCE, the Person is encouraged to seek advice or guidance from **FRCI**).

2.4.5 When to Disclose:

A whistleblower shall come forward with any information or document(s) that they, in good faith, reasonably believes in and an Improper Conduct, which is likely to happen, is being committed or has been committed.

2.4.6 How to Proceed:

Generally, all disclosures pursuant to this Policy are to be made via the circumstances specified below:

- i. A disclosure can be made in writing, verbally or via electronic means (e.g., electronic forms or e-mail). If a disclosure is made verbally, it must be followed by a report in writing using a **Whistleblowing Form** as **Appendix 2**.
- ii. If the whistleblower is an employee of the Bank, his/her name, designation, current address and contact numbers.
- iii. If the whistleblower is not an employee of the Bank, his/her name, name of employer and designation, current address, and contact number.
- iv. Basis or reasons for his/her concerns, including as many details of the Improper Conduct as reasonable possible, for instance, its nature, date, time and place of its occurrence and the identity of the alleged wrongdoer.
- v. Particulars of witnesses, if any.
- vi. Particulars or production of documentary evidence, if any.

2.4.7 The whistleblower may be asked to provide further clarification and information from time to time, for example, if an investigation is conducted.

2.4.8 Generally, anonymous disclosures will not be entertained. However, the Bank reserves the right to investigate anonymous disclosures depending on the facts, nature and severity of the allegation in the disclosure.

2.4.9 Where the alleged wrongdoer is not an employee of the Bank, management shall make an official report to the authorities, after consultation with **the BOD**.

2.4.10 If in the event that one of the designated recipient is seen to be conflicted, disclosure may be made to **any member of IEC or Law Enforcement Agencies**.

2.5 Requirement of Good Faith

In reference to the Bank Whistleblowing Policy (GPP 169), clause 1.6:

Whistleblower who intends to lodge any disclosure of Improper Conduct must ensure that the disclosure is made in Good Faith. The disclosure must be supported with a reasonable grounds or justification for believing such Improper Conduct has occurred or will occur and that the action is made for the best interest of the Bank and not for personal gain or tainted with bad intention.

2.6 Protection to Whistleblower

- 2.6.1 The Whistleblower identity will be accorded with protection of strict confidentiality unless otherwise required by law. The Whistleblower will be protected from detrimental action within the Bank as consequence of the disclosure. The Bank shall not tolerate detrimental action against the Whistleblower who has made disclosure in good faith even if the investigation subsequently finds it to be untrue.
- 2.6.2 The Bank considers adverse or detrimental action against Whistleblower as a serious Improper Conduct under the COBCE and such action shall be subject to disciplinary action including but not limited to legal action, where applicable.
- 2.6.3 Any disclosure of Improper Conduct in which the identity of the Person who make the disclosure cannot be identified is not qualified to be protected under the Whistleblowing Policy GPP169.

2.7 Revocation of Protection to Whistleblower

- 2.7.1 Any person who has not acted in Good Faith shall not be entitled to any protection under the Bank Whistleblowing Policy (GPP 169). The protection under this Policy shall be automatically revoked if the disclosures made does not fulfill the elements of Good Faith.
- 2.7.2 If the allegations are proven to be malicious or founded on bad faith, parties responsible may be subject to appropriate action such as disciplinary action including but not limited to legal action, where applicable.
- 2.7.3 Any Person before or after making the disclosure to **FRCI** and aware the same information is known by the other party except **Law Enforcement Agencies**.

2.8 Remedies of Detrimental Action

- 2.8.1 The Bank reserves the right to determine the necessary remedies to the Whistleblower in the case of adverse or detrimental action taken against the Whistleblower. The Bank also has the right to decide and act against any person within the Bank who violates this Policy and Procedures.
- 2.8.2 An application for a remedy should be made to the **IEC** or **Law Enforcement Agencies** (if the whistleblower is registered with the **Law Enforcement Agencies**) to be extended to the **People Sector** or the court (if the disclosure is made to the **Law Enforcement Agencies**). The application for remedy can be made using the form as **Appendix 3**.

2.9 Register of Disclosure

- 2.9.1 All disclosure of Improper Conduct, findings of investigations and monitoring of corrective actions shall be administered by the **IDVN**. **SVP FRCI** may assign **IDVN** to manage the register. The **BOD** shall be informed of any new disclosures of Improper Conduct.
- 2.9.2 CEO of the Bank shall be kept informed of any new disclosure of Improper Conduct where the CEO is not implicated (to the extent possible, without disclosure of identity of Whistleblower) so that any interim corrective action (if applicable) regarding any Improper Conduct can be taken immediately.
- 2.9.3 **IEC** upon receiving the disclosure of Improper Conduct shall notify the Whistleblower on the receipt of the disclosure **within three (3) working days**. The Whistleblower shall give full cooperation during investigation. **IEC** must provide opinion to **the BOD** whether the disclosure is a frivolous, tainted with bad faith or is a case where there are suspicious circumstances.
- 2.9.4 **IEC** after evaluation of the disclosure may forward it to the respective independent investigation department such as Internal Audit or Fraud Examiner or **Industrial Relations** department.
- 2.9.5 All documents with possibility of exposing the identity of Whistleblower shall be kept secret and can only be revealed by the instruction of the Court of Law.
- 2.9.6 Any person who attempts or make action to reveal any documents in relation to Whistleblower identity shall be regarded as committing gross misconduct and may be referred to the **People Sector or Law Enforcement Agencies**.

2.10 Investigation Procedures

- 2.10.1 If necessary, the following persons may be consulted (to the extent possible, without disclosure of identities of the Whistleblower) to assist and to provide relevant advice in relation to their respective areas:
 - a) **People Sector** - other than corrupt practices as per Malaysia Anti-Corruption Commission (MACC) 2009 for instance soliciting / receiving / offering / giving gratification, using position for gratification and intending to deceive.
 - b) Fraud Examiner - Fraud activities for instance falsification of documents, criminal breach of trust or as depicted in the Fraud Management Framework.
 - c) Any other negligence, non-compliance to existing policies, procedures or standards to Internal Audit.

2.11 Preliminary Assessment

- 2.11.1 **IEC may assign IDVN** to conduct preliminary **assessment** or verification against all disclosures to determine whether there are merits to initiate a full investigation. **A preliminary assessment is necessary in cases where additional information is required before a decision can be made or to gather information and/or confiscate any records.**
- 2.11.2 The findings of the preliminary assessment and recommendation shall be referred to **IEC** for its decision.
- 2.11.3 If the disclosure involves CEO or any other Senior Management, **the BOD** may decide and give mandate to other independent party to investigate.
- 2.11.4 If it is a criminal offence, the **BOD to decide** if the matter should be referred to the relevant authorities, such as MACC or PDRM for further action.

2.12 Full Investigation

- 2.12.1 If a full investigation is to be conducted, appointed investigation team shall conduct the investigation and to complete such investigation within three (3) months. Any extension subject to the complexity of the case.
- 2.12.2 All investigators shall be protected from any detrimental action. Any detrimental action taken against investigators directly from such disclosure is categorized as major misconduct and shall be reported to **the BOD**.
- 2.12.3 All information, documents, records and disclosures relating to the investigation of an Improper Conduct shall be kept securely to ensure its confidentiality.

2.13 Findings of Investigation

- 2.13.1 Upon conclusion of an investigation, the findings and recommendation shall be presented to the **BOD** for its decision.
- 2.13.2 In case where the disclosure implicates the CEO or any Senior Management Officer, he/she shall be abstained from the decision-making processes. The **BOD** shall review all findings and recommendations.
- 2.13.3 **FRCI to refer the decision by the BOD to People Sector for disciplinary action (if any)**

2.14 Protection to Investigation Officers (IO)

2.14.1 An investigation officer who has been authorized to conduct investigation of the Improper Conduct shall be accorded a protection from any adverse, detrimental action or retaliation from the Management of the Bank.

2.14.2 An investigation officer may lodge a report to the BOD or **Law** Enforcement Agencies if he/she encounter any threats, adverse, detrimental or retaliation from the Management of the Bank

2.15 Administration

FRCI shall administer all matters pertaining to the implementation of this Procedures. The administration shall include but not limited to review and create awareness to all staff and public.

2.16 Process Flow

Flow Chart	PROCEDURE	RESPONSIBILITY	REFERENCE DOCUMENT
<pre> graph TD Start([Start]) --> 1.1[1.1 Disclosure] 1.1 --> 1.2[1.2 Information Evaluation Committee (IEC)] 1.2 --> 1.3[1.3 Preliminary Assessment] 1.3 --> 1.4{1.4 IEC} 1.4 -- NO --> Temp[Temporarily closed / profiling until discovery of new evidence] Temp --> Feedback[Feedback to whistleblower (email / letter / other medium)] Feedback --> Corrupt[Corrupt activities i.e soliciting, receiving, offering, giving gratification] Corrupt --> A((A)) Corrupt --> BOD[BOD & CEO] BOD --> 1.4 1.4 -- YES --> Feedback </pre>	<p>1.1 Disclosures are received from Whistleblowers or Anonymous whistleblowers from various complaint channel. i.e. form, email and in person direct to FRCI.</p> <p>1.2 Upon receiving the disclosure of improper conduct, Information Evaluation Committee (IEC) shall notify the Whistleblower on the receipt of the disclosure.</p> <p>1.3 Integrity Detection & Verification will conduct preliminary assessment or verification against selected disclosures.</p> <p>1.4 After evaluation of the disclosure, IEC may forward it to the respective independent investigation department (Internal Audit or Fraud Examiner or Industrial Relations department).</p> <p>a. The BOD shall be informed of any new disclosure of improper conduct.</p> <p>b. CEO of the Bank shall be kept informed of any new disclosure of improper conduct where the CEO is not implicated.</p>	<p>IEC</p> <p>Integrity Detection & Verification</p> <p>IEC</p>	

Flow Chart	PROCEDURE	RESPONSIBILITY	REFERENCE DOCUMENT
<pre> graph TD A((A)) --> B[1.5 FULL INVESTIGATION] B --> C[1.6 BOD's Decision] C --> D[1.7 Notify People Sector] D --> E[1.8 Closed and Notified Whistleblower] E --> F[END] C --> G[Law Enforcement Agencies] </pre> <p>The flowchart starts with a circle labeled 'A'. An arrow points down to a rectangle labeled '1.5 FULL INVESTIGATION'. From there, an arrow points down to a rectangle labeled '1.6 BOD's Decision'. To the right of this rectangle is another rectangle labeled 'Law Enforcement Agencies', with an arrow pointing from '1.6 BOD's Decision' to it. From '1.6 BOD's Decision', an arrow points down to a rectangle labeled '1.7 Notify People Sector'. From there, an arrow points down to a rectangle labeled '1.8 Closed and Notified Whistleblower'. Finally, an arrow points down to a rectangle labeled 'END'.</p>	<p>1.5 If a full investigation is to be conducted, appointed investigation team shall conduct the investigation and to complete such investigation within three (3) months. Any extension is subject to the complexity of the case.</p> <p>1.6 Upon conclusion of an investigation, the findings and recommendation shall be presented to the BOD for its decision (to notify Enforcement Agencies for Criminal Offence).</p> <p>1.7 FRCI should notify People Sector for disciplinary action (if any).</p> <p>1.8 Case closed and whistleblower will be notified.</p>	<p>Integrity Detection & Verification</p> <p>BOD</p> <p>FRCI</p> <p>Integrity Detection & Verification</p>	

3.0 APPENDIX

3.1 Appendix 1 – Whistleblowing Frequently Asked Questions (FAQs)



FAQ

3.2 Appendix 2 – Whistleblowing Form



Whistleblowing Form

3.3 Appendix 3 – Remedies of Detrimental Action Form/ *Borang Tindakan yang Memudaratkan*



Remedies of
Detrimental Action
Form