



KBZ BANK
STRENGTH OF MYANMAR

WHISTLEBLOWING POLICY
HUMAN RESOURCE FUNCTION

Contents

PROCUDER APPROVAL MATRIX & DOCUMENT VERSION CONTROL

1. INTRODUCTION	4
2. REPORTING A PROTECTED DISCLOUSER.....	7
3. PROCEDURE OF INVESTIGATION	8
4. ACTION FOLLOWING INVESTIGATION	11
5. PROTECTION OF WHISTLEBLOWERS	11
6. REPORTING AND RECORD KEEPING	13
7. TRAINIG	13
8. AMENDMENTS TO THE POLICY.....	13
9. ANNEXURES	14
10. FREQUENTLY ASKED QUESTIONS.....	17

PROCEDURE APPROVAL MATRIX

HUMAN RESOURCES – WHISTLEBLOWING POLICY

Name	Approver or Reviewer	Role / Designation	Approval
Version 1: <ul style="list-style-type: none"> • Human Resources • Legal & Compliance • Risk • Internal Audit 	Reviewer	<ul style="list-style-type: none"> • Head of Human Resource • Head of Legal & Compliance • CRO • Head of Internal Audit 	The reviews and inputs by the respective reviewers are conducted between Sep- Dec 2020
Version 1: Board and Audit Risk Committee (BARC)	Approver	Mr. Chairman and members of BARC	Approved on 4 Dec 2020

DOCUMENT VESION CONTROL

Version #	Change Control #	Revision Date	Revised by	Revision Description
Version 1	Revamp of the existing Whistleblowing Policy	4 Dec 2020	Reviewed by the internal reviewers	Enhanced to align with global best practices covering key areas - objective, approach taken, reporting of protected disclosures and investigation procedures, action following investigation, protection of whistle-blower, reporting and record-keeping, and training.

WHISTLEBLOWING POLICY

OF

KANBAWZA BANK

1. INTRODUCTION

1.1. OVERVIEW

Kanbawza Bank (“**KBZ Bank**”) is committed to adopting the highest business, governance, ethical and legal standards and is committed to maintain and provide to all its stakeholders highest standard of transparency, probity and accountability. Therefore, KBZ Bank sets out the Whistleblowing Policy (“**the Policy**”) aimed at providing a safe space for whistle-blowers to voice their concerns about any suspicious or undesired events/ activities, which are against the policies of KBZ Bank or may have an adverse impact on the business or goodwill of KBZ Bank. The purpose of this Whistleblowing Policy is to develop a culture where it is safe and acceptable for all the employees and stakeholders of KBZ Bank to raise/voice genuine concern in good faith without any fear of revenge, loss of job, discrimination, victimization or harassment and in a responsible as well as effective manner.

Nothing in this Policy is intended to limit any protections provided to Whistle Blowers by any applicable laws or regulations, or to place any limits on a Whistle Blower’s ability to communicate with government, administrative, or enforcement authorities, as provided for by law.

1.2. OBJECTIVE OF THE POLICY

The objective of this policy is to:

- a. Encourage employees to report matters without any fear of victimization, discrimination or disadvantage at workplace and promote transparent and ethical work culture.
- b. Provide a safe environment to employees of KBZ Bank to blow the whistle where they know or suspect any immoral, unethical, fraudulent act of any current or former employees, vendors, contractors, service providers and customers which may cause financial or reputational risk to KBZ Bank.
- c. Provide a mechanism to ensure that concerns/Protected Disclosures are properly raised, appropriately investigated and addressed.
- d. Adopt highest standards of professionalism, honesty, integrity and ethical behaviour at workplace.
- e. Create awareness amongst employees and stakeholders regarding Whistleblowing.

- f. Enable the CEO, Board Audit Committee (“BAC”) and the Board to be informed at an early stage about any fraudulent, immoral, unethical or malicious activities or misconduct and take appropriate action.

1.3. Scope

- a. This policy is designed to enable employees who believe they have discovered malpractice or impropriety which include the following:
 - (i) Unlawful acts or orders requiring violation of a law, gross waste, mismanagement, abuse of authority and resources of KBZ Bank;
 - (ii) Fraud: a wrongful or criminal deception intended to result in financial or personal gain by management, employees or third parties;
 - (iii) Corruption: the offering, giving, receiving, or soliciting, directly or indirectly, anything of material value or providing undue benefits to influence improperly the action or inaction of another person/ employee;
 - (iv) Misconduct: failure by KBZ Bank’s personnel to observe KBZ Bank’s policies, rules and Code of conduct;
 - (v) Collusive practices: an arrangement between two or more persons/ employees designed to achieve bad faith objectives, including improperly influencing the actions of another person/ employee; and
 - (vi) Any other activity which undermines KBZ Bank’s operations and mission. (Refer also FAQs for the details examples of malpractice/impropriety). This Policy is not designed to question financial or business decisions taken by the Bank nor should it be used to reconsider any matters which have already been addressed under disciplinary or other procedures.

- b. Concerns can be raised for issues that may be detrimental to the interest of the Bank, e.g. fraud, malpractice, impropriety, abuse of power, health and safety risk, abuse including physical, sexual, psychological or financial abuse, exploitation or neglect or violation of the law or Code of Conduct.

- c. A whistle-blower is not required or expected to investigate the concern known or determine or perform any corrective/remedial action that may be warranted for the case but is expected to provide full and honest information based on his/her knowledge of the reported issue to facilitate investigation.

- d. Personal grievances or matters relating to employment terms and condition are not legitimate reasons to utilize the “whistleblowing” procedure and should be redirected to appropriate channels such as line managers and HR leads.

1.4. APPLICABILITY OF THE POLICY

This policy applies to all employees of the Bank including the Board of Directors and all those acting / working for and / or on behalf of the Bank such as contract employees, retainers, trainees, interns, business partners, etc. and their employees.

1.5. ADMINISTRATION OF THE POLICY

The Whistle Blower Committee of KBZ Bank shall be responsible for the implementation and revision of this policy.

1.6. DEFINITIONS

- a. **“Whistleblowing”** is a communication to the Whistleblowing Officer to expose, alleged fraudulent, immoral, unethical or malicious activities, or discrimination, or some other type of adverse occurrence that violates a law, or a regulation, or a policy, or morals, or ethics and especially those matters that jeopardize the reputation of KBZ Bank.
- b. **“Board of Directors”** means the Board comprised of all the directors of the bank.
- c. **“Key Managerial Personnel”** means
- (i) Persons performing executive functions at the Bank such as the Chief Executive Officer (**“CEO”**), Deputy Chief Executives Officers (**“DCEOs”**), Chief Financial Officer (**“CFO”**), Chief Operating Officer (**“COO”**), Chief Compliance Officer (**“CCO”**), Chief Internal Auditor (**“CIA”**), Chief Risk Officer (**“CRO”**) and Chief Credit Officer, and Deputy’s for any of the above designations;
 - (ii) Designation of VCGM/ Head of business function of KBZ Bank and above.
- d. **“Employee”** means every employee of KBZ Bank, including senior management.
- e. **“Whistle Blower Committee”** means the committee as constituted by the Board of Directors. The Whistle Blower Committee include the following:
- Whistleblowing Officer (Chairman of the Whistle Blower Committee)
 - Head of Human Resources Department
 - Head of Legal & Compliance
 - Head of Internal Audit

- f. **“Investigators”** are the members of the investigation team authorised, consulted or approached or appointed by the Whistle Blower Committee which may include the internal/external auditors, the police, HR, compliance/legal team representative, and other competent authorities as the case may require.
- g. **“Protected Disclosure or Concern”** means any communication made in good faith that discloses or demonstrates information that may provide evidence of unethical or improper activity. However following types of disclosure will ordinarily not be considered as a disclosure and will not be taken up for consideration under this policy:
- a) Disclosures that are Illegible, if handwritten
 - b) Disclosures that are trivial or frivolous in nature
 - c) Matters which are pending before a court of Law, State, National Human Rights Commission, Tribunal or any other judiciary or sub judiciary body
 - d) Issue raised, relates to service matters or personal grievance such as increment, promotion, appraisal etc.
- h. **“Whistle-blower”** is a person who raises a concern or sends a communication to the Whistleblowing Officer of KBZ Bank, and includes current or former employees of KBZ Bank, shareholders, vendors, contractors, service providers, customers, or the general public. The role of a Whistle-blower remains to the extent of reporting only and will neither be considered an investigator nor involved in determining the appropriate corrective or remedial action that may be required under the given situation.
- i. **“Retaliation/ Victimization”** means any act of discrimination, revenge or harassment directly or indirectly taken against a Whistle-blower, by any person, for making a disclosure under this Policy.

2. REPORTING A PROTECTED DISCLOSURE

- a. There are various ways in which a whistle-blower can report a disclosure to the Bank.
- **Through email**

<u>Concern related to</u>	<u>By Email</u>
All the employee including the Directors and / or Key Managerial personnel (refer definition), the disclosure should be addressed to the Whistleblowing Officer:	whistleblowing.officer@kbzbank.com

- **Through letters**

<u>Concern related to</u>	<u>By Letter</u>
All the employee including the Directors and / or Key Managerial personnel (refer definition), the disclosure should be addressed to the Whistleblowing Officer:	The Whistleblowing Officer KBZ Bank 53, 3rd Flr. Strand Road, Btw. Bon Soon Pat & 32nd Street, Pabedan Township, Yangon, Myanmar

Disclosures should be factual and not speculative. It should contain as much specific information as possible to allow for proper assessment of the disclosure and the urgency of a preliminary assessment procedure (Refer Annexure 1 for reference).

- b. KBZ Bank encourages employees to disclose their name to any disclosures made under this policy. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Whistle Blower Committee. In exercising this discretion, the factors considered will include:
 1. The seriousness of the concern raised
 2. The credibility of the concern
 3. The likelihood of confirming the allegation from attributable sources
- c. For whistle blowers who are not executives/employees of the Bank, the Protected Disclosure must be as per 2.a. and the whistle blower shall disclose details such as name, address, relationship with the Bank.
- d. Every Protected Disclosure filed shall be made in good faith and the person making such disclosure shall understand that he/she reasonably believes that the information disclosed by him/her and allegation contained therein is substantially true.

3. PROCEDURE OF INVESTIGATION

a) Preliminary Assessment

1. On receiving a concern, the Chairman of the Whistle Blower Committee will perform a preliminary assessment to check whether the concern raised is genuine and falls within the purview of whistleblowing policy.
2. Whistleblowing concern that provides notice of any type of misconduct may trigger the requirement of an investigation.

3. The committee, based on the preliminary review of the received concern, may decide on the investigation process. The committee may decide to direct the investigation process through bank's internal departments ("internal investigation") or outsource the same to an external investigation agency ("external investigation")

b) Assignment of investigation case

1. An external investigation may be called for based on the following indicative factors:
 - a. Concerns involving fraud, bribery and misconduct where the Bank's customer is involved
 - b. Concern that involve "KMP" and above of the Bank
 - c. Concern where Bank's internal departments may appear conflicted to conduct the investigation
 - d. Concern where the "purpose" for conducting the investigations, calls for higher confidentiality/sensitivity requirements

2. Following indicative considerations may be taken for assignment of investigation internally:
 - a) Knowledge of product / department involved in the Concern
 - b) Employee/ Department that can extend unbiased view around the concern
 - c) Avoid using "Reporting Line Managers" or Supervisors of the employees involved in the concern
 - d) Experience of conducting investigations within the bank.

- e) If any member of the Investigation process has a conflict of interest, then he/she must refrain from participation in the process, and other member/members should take charge of the proceedings.

Illustrative examples for assignment of internal / external concerns are tabulated below:

Sr	Type of Concerns	Examples	Potential Investigation Forums (Internal)	Potential Investigation Forums (External)
1	Kickbacks/ Bribery	Concerns around Anti-bribery indicating bribery & corruption	Fraud Monitoring Unit	The Bank may want to use an external agency in these
2	Harassment at workplace	Concerns highlighting work pressure, dual employment (by senior / reporting line of management)	Human Resources	

3	Conflict of Interest situations or violation of bank's policies/procedures	Instances where an employee (s) compromises banks policy and procedures for personal gain	Legal & Compliance Function	categories based on the employees involved ("KMP" and above) and or "seriousness/sensitivity" of the concern raised
4	Suspected Financial Crime Activity	Concerns highlighting suspected theft, compromise of Bank's data/ customer information	Fraud Monitoring Unit	
5	Mis - selling	Concerns highlighting customer mis selling at the branches	Fraud Monitoring Unit	
6	Use of Bank's assets for personal use	Concerns related to misutilization of bank's minor assets for example use of printers for personal use, use of office stationery for personal consumption etc.	HR /admin department	

c) Planning & timeline of the investigation

- i. The Chairman of Whistle Blower Committee is required to ensure that the concern received is acknowledged via email or a letter within 7 working days wherever an email address/address as available.
- ii. Concerns received involving the Board of Directors are required to be forwarded to the Board Audit Committee within 7 working days for preliminary assessment and investigation requirements, as applicable. The Whistle Blower Committee shall be required to implement the recommendations of the BAC, if any, and in case of difference of opinion, the same may be resolved through discussions. If unresolved, the discontent of the Whistle Blower Committee shall be recorded and documented.
- iii. The investigation shall be completed within 45 working days of the receipt of the concern. If the investigation is not completed within the given time period, then the Whistle Blower Committee shall give a report to the Board Audit Committee (BAC) and the CEO stating the facts of the case under investigation along with the reasons for the delay and seek additional time for closure of investigation.

d) Investigation of concern

- i. If the preliminary review confirms, facts stated in the concern, then the Chairman shall proceed with the following steps after discussion with the Whistle Blower Committee:
 - Formulate the investigation team depending upon the requirement of the concern;

- Consult the HR team and the legal team, to determine legal ramification of the concern (if required);
 - Consider the involvement of the Bank’s auditors (internal/external/special) or the jurisdictional police or any other external investigation agency or person if such a need arises;
- ii. The findings of the investigation should be communicated by the investigation team to the Whistle Blower Committee through reports (in case of urgency of the matter the findings can be communicated through email or other official means) for discussion. On completion of the investigation, the Whistle Blower Committee shall forward the report and the relevant information, along with their recommendations to the BAC and the CEO (if required).

3.1 CONFIDENTIAL REPORTING

Strict confidentiality will be observed in submission of the investigation reports. The report along with the result of investigation by the Whistle Blower Committee shall be submitted to the BAC and the CEO. The BAC or the CEO may decide what further action should be taken in accordance with Section 4 below, if any, including raising the result of the investigation with the BAC of KBZ Bank.

4. ACTION FOLLOWING INVESTIGATION

If involvement of the KBZ Bank’s officials or employees in fraudulent, immoral, unethical or malicious activities and other malpractices is proved during investigation of the case, than disciplinary or legal action will be initiated as per applicable rules and procedures of KBZ Bank.

For external parties or government authority, KBZ Bank will based on investigation report and recommendations, consider taking appropriate legal action.

5. PROTECTION OF WHISTLE BLOWERS

The bank will ensure prevention against retaliation, victimization or harassment of any employee raising a concern under this Policy. Any employee who makes a disclosure or raises a concern under the Policy will be protected, if the employee:

- a. Discloses the information in good faith
- b. Believes it to be substantially true
- c. Does not act maliciously nor makes false allegations; and

d. Does not seek any personal or financial gain from the Bank

The Bank will not tolerate any attempt on the part of anyone to retaliate, apply any sanction or disadvantage or to discriminate against any person, who has reported to the Bank any serious and genuine concern regarding an apparent wrongdoing.

In the event where the Whistle blower is victimized in any manner upon making a disclosure, he/she may report the matter to the whistleblowing officer for seeking protection at the following email address whistleblowing.officer@kbzbank.com.

5.1 PROTECTION UNDER THE POLICY

Protection under the Policy shall be available to the employee who raises the concern under this Policy till such time that the complainant's employment subsists with the Bank or its subsidiaries. An employee who wishes to report any disadvantageous act or victimization as a result of raising concern under whistle-blower mechanism can do so within three months of such action being performed or recognised by employee. After this time period has elapsed, the concern, if raised shall not be treated as a concern under this Policy. Notwithstanding the foregoing, the Whistleblowing officer may direct, in his/her discretion, that such concern be considered under the Policy even if raised beyond the three months period.

Any attempt on the part of any employee to misuse the Policy for personal advantage will be dealt with strictly by the Bank.

Nothing in this Policy precludes or is intended to preclude a complainant from seeking a monetary award from a government, administrative, or law enforcement authority, as provided for by law.

The protections afforded under this Policy shall in no way condone an Employee's violation of the Bank's Code of Conduct or other internal policies or schemes, and this Policy therefore does not preclude the Bank from taking appropriate action against an employee who violates the Code of Conduct or other internal policies or schemes. Any proceedings undertaken by the Bank to determine such a violation by an employee, and any ensuing action taken by the Bank against an employee on account of a determination of such violation, are intended to be separate and distinct from the provisions of this Policy.

The foregoing is not intended to undermine protections afforded by this Policy in cases where the Whistleblowing officer is satisfied that the employee has raised the concern in good faith.

Additionally, an employee not regarded as a whistle-blower under the Policy, including on account of such employee's acts or omissions, shall not be entitled to the protections under this Policy.

6. REPORTING AND RECORD KEEPING

Records pertaining to the complaint shall be maintained by the Whistleblowing Officer. Records shall be maintained as per the existing record keeping policy of the bank.

All whistle blowing concerns filed/ reported must have a unique Reference Number. The concerns received shall be chronologically numbered and documented.

The Whistle Blower Committee shall submit a quarterly status report to the BAC and the CEO on the total number of concerns raised and redressed during the quarter and pending at the end of such quarter, with summary of the findings of all concerns and the corrective actions taken.

7. TRAINING

All Staff members must be trained within three months of joining the Bank – and at least once every year thereafter on the whistle-blower practices. All the training should be delivered to educate the employee about the elements of whistle-blower practices such as reportable matters, timelines for reporting, escalation mechanism, protection under this policy etc.

8. AMENDMENTS TO THE POLICY

The whistleblowing officer of KBZ Bank shall be responsible for keeping the policy document updated. This Policy shall be subject to a formal review by the Whistle Blower Committee on a periodic (at least once a year) basis and the proposals for any changes/ modifications/ amendments therein shall be submitted to the BAC of KBZ Bank for consideration and its further approval.

The relevant documents of the policy shall be subject to archival as per the existing policy of the Bank.

9. ANNEXURES

Annexure 1 - Template for Reporting Violation

To: The Whistleblowing Officer

Please select the applicable incident type(s) from the list below that best describes the issue(s) you are reporting. Please note that multiple issues can be selected

- | | |
|---|--------------------------|
| 1. Misappropriation of Bank assets or resources | <input type="checkbox"/> |
| 2. Conflict of interest | <input type="checkbox"/> |
| 3. Inappropriate sharing of confidential information | <input type="checkbox"/> |
| 4. Financial fraud of any nature | <input type="checkbox"/> |
| 5. Violation of Laws, polices and Bank's Code | <input type="checkbox"/> |
| 6. Non-adherence to safety guidelines | <input type="checkbox"/> |
| 7. Inaccurate financial reporting | <input type="checkbox"/> |
| 8. Bribery & Corruption | <input type="checkbox"/> |
| 9. Other forms of Harassment – Victimization, Bullying, Discrimination etc. | <input type="checkbox"/> |
| 10. Social Media Usage | <input type="checkbox"/> |
| 11. Misuse of authority | <input type="checkbox"/> |
| 12. Environment, health and safety | <input type="checkbox"/> |
| 13. Others (please Specify) | <input type="checkbox"/> |

Please provide name, designation and department of the person(s) involved?

Name	Department	Designation
<u>Individual 1</u>		
<u>Individual 2</u>		
<u>Individual 3</u>		
<u>Individual 4</u>		

When did the incident occur? (Please provide tentative date if you do not know the exact date)

Please confirm the location of the incident

Please provide a detailed description of the incident. To enable your company to act on your disclosure, you are requested to provide specific information. Where possible, please include names, locations, date, time, etc. Please note that this field is limited to 5,000 characters.

Do you have evidence in support of your allegations? (If Yes please provide the details)

Yes

No

Is anyone else aware of this incident? (If Yes Please provide the details)

Yes

No

Remarks:

Is there any additional information that would facilitate the investigation of this matter? (If Yes Please provide for the same)

Yes

No

Remarks:

Date: _____

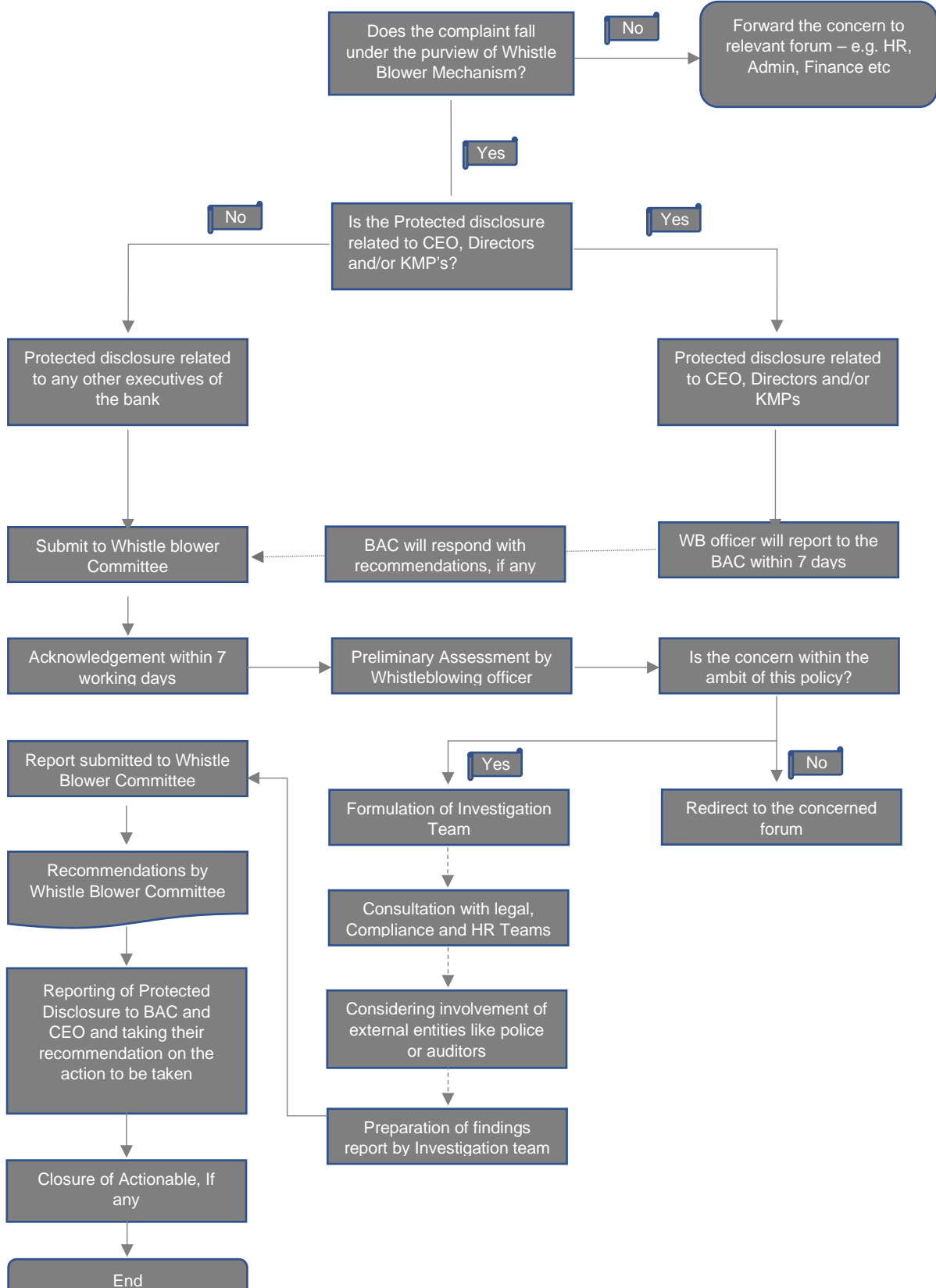
Location: _____

Name of the Person Reporting (optional): _____

Contact Information (Including email optional): _____

ANNEXURE 2 – PROCESS FLOW TO HANDLE PROTECTED DISCLOSURES

Complaint



10. FREQUENTLY ASKED QUESTIONS

1. What is whistleblowing?

Employees are usually uniquely situated within the Bank and amongst the first to know when a Bank employee is breaching a law, regulation, policy or code of conduct, or otherwise committing an impropriety in the Bank. A culture of “turning a blind eye” to such problems usually means that the alarm will not be sounded, and management will not have a chance to take necessary appropriate action before substantial damage results.

Whistleblowing can therefore be described as providing information about potentially illegal and/or unethical practices i.e., impropriety within the Bank.

2. What is impropriety?

Impropriety involves any unlawful, illegal, unethical or otherwise improper behaviour and can include, among others:

- a. An unlawful act, whether civil or criminal;
- b. Breach of or failure to implement or comply with approved the Bank policy;
- c. Utilizing the Bank’s funds in an unauthorized manner;
- d. Not observing the Group’s internal and financial control procedures and policies;
- e. Questionable accounting or auditing practices;
- f. Abuse of power or authority for any unauthorized or ulterior purpose;
- g. Intentional provision of incorrect information to public bodies; and
- h. Suppressing or attempting to suppress any information relating to the above.

3. Who should make Concern?

Any Employees who make a disclosure or raises a concern under this Policy will be protected if the individual:

- a. Discloses the information in good faith;
- b. Has reasonable grounds to believe it to be substantially true;
- c. Does not act maliciously; and
- d. Does not seek any personal or financial gain.

4. Can the employee raise a concern to his superior?

NO, the employee has to follow the whistle-blower mechanism and use the methods available to report a concern. The employee can:

- Report using the email
- Report using a letter addressed to whistle-blower officer of the bank.

The concern against any employee of the bank including the CEO, Directors and / or Key Managerial personnel shall be sent to the whistleblowing officer of the bank.

5. What information should an employee include in a concern under this Policy?

Information pertaining to the concern should be factual and not speculative. It should contain as much specific information as possible to allow for proper assessment of the concern. Details such as Date of Issue first known, tentative period the issue persisted, approx. amount involved (if quantifiable), Individuals Involved, individuals aware about the concern, etc shall be furnished (Refer Annexure 1 for reference).

6. Is it mandatory to disclose his/her identity while reporting a concern under the policy?

Employees are encouraged to provide their name and contact details while raising a concern under the policy. This will assist the investigating team to seek additional details or evidence as may be required during the enquiry. Anonymous disclosures may only be considered at the discretion of the Whistle Blower Committee/BAC.

7. What will the Bank do after receiving a complaint/concern?

- a. The Chairman of the Whistle Blower Committee is required to ensure that the concern received is acknowledged via a email or a letter within seven working days, wherever an email address/address is available.
- b. Investigation procedures shall be initiated as per the defined policy.
- c. The investigation shall be required to be completed within 45 days of the receipt of concern.

8. Can an employee be fired/ denied promotion as a result of his action of raising a concern?

The Bank will not tolerate any harassment or victimization (including formal pressures) and will take appropriate action to protect those who raise a concern in good faith.

No action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation. Efforts will be made to ensure confidentiality as far as this is reasonably practical.

9. Malicious, Mischievous and False Allegation

The Bank is proud of its reputation of having high standards of integrity. It will therefore ensure that adequate resources are put into investigation for any complaint that it receives. However, the Bank

will regard the making of any frivolous, bad faith, malicious, mischievous or false allegations by any employee of the Bank as a serious disciplinary offence that may result in disciplinary action, up to and including dismissal for cause.

10. What are the roles and responsibilities of the Whistleblowing Officer?

The Whistleblowing Officer nominated by the Bank shall be responsible for:

- Maintenance and implementation of the Whistle-blower policy in alignment with internal bank's policy and latest regulatory updates.
- Be the focal point for receiving & acknowledging the whistle blower concern from all the stakeholders of the bank.
- Conduct preliminary investigation and review into the concern, submit regular updates to the Board/Senior Management etc.
- Participate in the Whistle Blower committee proceedings and oversee the functioning of the committee.
- Facilitate flow of information and support to external investigators (if any) as the need be, coordinate with various stakeholders within and outside the Bank for case resolution and conclusions.
- Initiating employee awareness initiative relating to whistleblowing channels, examples of concerns considered for whistleblowing or otherwise, any recent updates to the policy and regular policy refresher initiatives. Support and assistance can be sort from necessary departments within the Bank.
- Maintain the adequate records of concerns reported, investigation case files, action plan etc for future record purpose.