



CHARTERED INSTITUTE™
OF ISLAMIC FINANCE
PROFESSIONALS

Chartered Institute of Islamic Finance Professionals
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WHISTLEBLOWING POLICY & PROCEDURES

TABLE OF CONTENTS

1.0	OBJECTIVE	3
2.0	SCOPE.....	4
3.0	ABBREVIATIONS AND DEFINITIONS	5
4.0	RESPONSIBILITY.....	6
5.0	INTRODUCTION.....	7
6.0	ROLES AND RESPONSIBILITIES	7
7.0	DISCLOSURE	8
8.0	DISCLOSURE PROCEDURES	10
9.0	PROTECTION OF THE WHISTLEBLOWER	12
10.0	REVOCAION OF PROTECTION.....	13
11.0	RECEIVING A DISCLOSURE/WHISTLEBLOWER REPORT.....	13
12.0	CONDUCTING AN INVESTIGATION.....	14
13.0	CONSEQUENCE OF WRONGDOING OR WRONGFUL DISCLOSURE	16
14.0	RETENTION OF DOCUMENTS	16
15.0	COMMUNICATION	17
	APPENDIX 1: Whistleblowing Process Flow	18
	APPENDIX 2: Whistleblower Reporting Form	19

1.0 OBJECTIVE

- 1.1 The objective of this Policy is to encourage all the CIIF's stakeholders including but not limited to the employees, Grand Council, business associates (third parties), partners and affiliates to raise genuine concerns about possible improprieties involving the CIIF in matters relating to financial reporting, accounting controls, compliance, improper conduct and other wrongdoings and malpractices. This Policy facilitates the reporting of such matters and also to protect the individuals disclosing the information from detrimental action in accordance with the Whistleblower Protection Act 2010 (Act 711).
- 1.2 This Policy is designed to:
 - 1.2.1 Promote and maintain high transparency and accountability in the work place;
 - 1.2.2 Promote good corporate governance practices in the work place;
 - 1.2.3 Ensure that stakeholders can raise concerns without fear of reprisals and safeguard such person's confidentiality;
 - 1.2.4 Protect the whistleblower from reprisal as consequence of making a disclosure;
 - 1.2.5 Provide a transparent and confidential process for dealing with concerns;
 - 1.2.6 Protect the long-term reputation of the CIIF;
 - 1.2.7 Support the CIIF's values; and
 - 1.2.8 Maintain a healthy working culture and efficient company.
- 1.3 The principles underpinning the Policy are as follows:
 - 1.3.1 Internal procedures to facilitate necessary whistleblowing, in a timely and responsible manner, are in place and made known to all stakeholders of the company;
 - 1.3.2 All disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
 - 1.3.3 The CIIF will not tolerate harassment or victimisation of anyone raising a genuine concern;
 - 1.3.4 The identity and personal information of the Whistleblower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law;
 - 1.3.5 The Whistleblower and the wrongdoer will be treated fairly. The Whistleblower will be informed of this status of his/her disclosure and the alleged wrongdoer will be given the opportunity to respond to all allegations at an appropriate time;
 - 1.3.6 Personal information, including the identity of the Whistleblower and the alleged wrongdoer shall only be revealed on a "need-to-know" basis;
 - 1.3.7 The CIIF will ensure no one will be at risk of suffering reprisal as a result of raising concern even if the individual is mistaken. The CIIF, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue; and

- 1.3.8 Any form of retaliation against individuals who have reported a wrongdoing or who have facilitated with the investigations is a breach of the principal obligation of all staff members to uphold the highest value and integrity.
- 1.4 The Policy is therefore fundamental to the CIIF's professional integrity. In addition, it reinforces the value placed on staff to be honest and respected members of their individual professions. It provides a method of properly addressing bona fide concerns that individuals within the CIIF might have, while also offering Whistleblower's protection from victimisation, harassment, or disciplinary proceedings.
- 1.5 It should be emphasised that this Policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the CIIF nor should it be used to reconsider any matters which have been investigated under the harassment, grievance or disciplinary policies and procedures. It should encourage individuals to come forward with credible information regarding illegal practices or violations of adopted policies of the CIIF and should explicitly protect the individuals from retaliation for coming forward with the information.

2.0 SCOPE

- 2.1 The Policy is applicable to all CIIF Personnel, Grand Council, and all parties who have established relationship with the CIIF including but not limited to members, consultants, suppliers, vendors and service providers with regards to the wrongdoings listed in clause 7.5.
- 2.2 Members of the CIIF are also encouraged to whistleblow should they discover any of the incidences above, where relevant. In the event that the case reported involved elements of criminal offence or corruption, it will be referred to the relevant authorities, i.e. PDRM or MACC, as per guidelines stated in the CIIF Referral Policy upon advice and instruction from the CEO or GC or any sub-committee appointed by GC.
- 2.3 However, this Policy is not intended to cover the following:
- 2.3.1 Customers' complaints about the CIIF's products and services;
 - 2.3.2 Personal grievances concerning an individual's terms and conditions of employment or other aspects of the working relationship, such as complaints of bullying or harassment, which are to be dealt with under the CIIF's procedures on grievance;
- 2.4 Allegations and concerns expressed anonymously shall be considered at the discretion of the CIIF. In the exercise of such discretion, the factors to be considered by the CIIF shall include, without limitation, the seriousness of the allegation, its credibility, and the extent to which the allegation can be confirmed and/or corroborated by contributing complaints shall be considered when made in the reasonable sources.

- 2.5 This Policy shall be read in conjunction with the CIIF Anti-Bribery and Corruption Policy and Procedures, CIIF Employee Code of Conduct, CIIF Handling Disciplinary Action Policy and Procedures, and the Malaysian Anti-Corruption Commission Act 2009 and its 2018 amendment (“MACCA”). Provisions in this Policy shall be reviewed and amended whenever necessary to ensure its effective implementation.

3.0 ABBREVIATIONS AND DEFINITIONS

3.1 Abbreviations

Term	Definition
CIIF	Chartered Institute of Islamic Finance Professionals
GC	Grand Council constituted for the management of the affairs of the CIIF
CEO	Chief Executive Officer of the CIIF
HDP	CIIF Handling Disciplinary Problems Policy and Procedures
LGU	Legal and Governance Unit
PDRM	Polis Diraja Malaysia
PDPA	Personal Data Protection Act 2010
MACC	Malaysia Anti-Corruption Corporation
WPA	Whistleblower Protection Act 2010 (Act 711)

3.2 Definitions

In these Terms the following words shall have the meaning hereby assigned to them except where the context otherwise requires:

Term	Definition
Audit Committee	The Audit Committee of the Grand Council of the CIIF
Authorised Officer	The Authorised Officer will be the CEO or GC where the Disclosure relates to the CIIF Personnel and all parties; or the Chairman of the Grand Council where the Disclosure relates to the CEO or the MACC where the Disclosure relates to the members of the Grand Council
All parties	All individuals/parties that has interest or concern on the CIIF’s activities and business, directly or indirectly or having established relationship with the CIIF including but not limited to Grand Council, members, consultants, suppliers, vendors and service providers.
CIIF Personnel	A person employed by the CIIF, whether confirmed in a position or on probation, or any other person employed on contract, temporary basis or secondment or appointed by the CIIF (inclusive of interns and apprentices)
Confidential Information	Information that cannot be disclosed under the WPA and includes information about the identity, occupation, residential address, work address, contact details such as mobile phone number or landline number or the whereabouts of a Whistleblower and a person against whom a Whistleblower has made a Disclosure of Improper Conduct; information disclosed by a Whistleblower; and information that, if

Term	Definition
	disclosed, may cause detriment to any person
Detrimental Action	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 the taking of disciplinary action; and d) A threat to take any of the actions referred to in paragraphs (a) to (c)
Disciplinary Offence	Any action or omission that constitutes a breach of discipline as provided by law or in a code of conduct, a code of ethics, a circular or a contract of employment, as the case may be
Disclosure	A statement made by a Whistleblower whether verbally or reduced into writing, to an Authorised Officer /Recipients
Enforcement Agencies	Any unit or body set up or established by the government having investigative and enforcement powers
His	Denote both male and female
Improper Conduct	A wrongdoing referred to in clause 7.7, and means any conduct which if proved, constitutes a Disciplinary Offence or a criminal offence
Recipient	The Head of Legal and Governance/Integrity Officer
Related Person	Any person related to or associated with the Whistleblower, including members of his family or close friends, so long as the relationship is not too remote
Management	Any individual/group/committee which has a decision-making authority on certain issues/areas
Misconduct	A mode of behaviour or conduct of an employee which is inconsistent with expressed or implied obligations to the CIIF
Whistleblower	A person speaking on improper and illegal activities and can be a CIIF Personnel or all other parties
Whistleblowing	The Disclosure by a person to the CIIF or to those in authority of mismanagement, corruption, illegality, violation of the Code of Conduct or some other wrongdoings.
WPA Guidelines	Guidelines for the implementation of the WPA issued by the Legal Affairs Department of the Prime Minister's Department, dated 21 March 2011

4.0 RESPONSIBILITY

- 4.1 All Staff of CIIF including the GC members are required to adhere to this policy at all times.

- 4.2 Head of Legal and Governance Unit (“LGU”) and the team are the owner of this policy and are responsible for the review and update of this policy, which is to be done at least once in two (2) years or as and when required by the Management to ensure it is in compliance with the latest requirements.

5.0 INTRODUCTION

- 5.1 This Whistleblowing Policy & Procedures (“Policy”) is developed in line with the practice of integrity and good corporate governance and to ensure that internal and external parties working with the company have an avenue to raise concerns about potential improprieties in business conduct in a secure and confidential manner.
- 5.2 This Policy therefore aims to provide a platform and internal mechanism for both the CIIF Personnel and external parties to address concerns and report information relating to wrongdoings, malpractice, misconduct, corrupt, unethical, illegal activities and omissions that are against the rules of the company, regulations and legal requirements which may be committed or about to be committed that may adversely impact the CIIF’s reputation.
- 5.3 This Policy complements the normal channels of communication and reporting lines within the CIIF. It provides an alternative route for all parties to raise concerns if the usual lines of communication are not available as the complaint relates to his immediate supervisor or head of unit/department.
- 5.4 This Policy demonstrates the CIIF’s and its employees’ commitment to high legal and ethical standards. Integrating Whistleblowing policies into CIIF’s practices and culture helps to deter fraud, corruption, and mismanagement and contributes towards integrity and ethical conduct within the organisation.

6.0 ROLES AND RESPONSIBILITIES

- 6.1 The CIIF Personnel is responsible for reporting any wrongdoings in accordance with the procedures outlined in this Policy.
- 6.2 Whistleblower
- 6.2.1 Whistleblowing is a form of Disclosure. It involves a person raising concerns at an early stage about serious risks of wrongful activities or reporting a wrongdoing. For the purposes of this Policy, such person is called “Whistleblower”.
- 6.2.2 The Whistleblower may be a person who works in or with the CIIF or a person who is external to the CIIF, who has knowledge of the underpinning facts and circumstances surrounding a wrongdoing.
- 6.2.3 To report any wrongdoings in workplace or occurring in the CIIF performed by its personnel and the Grand Council.
- 6.2.4 Give full cooperation to the investigators during the investigation.
- 6.2.5 To treat any information shared during investigation as confidential.

- 6.3 Recipient and Authorised Officer
 - 6.3.1 The Recipient receive, evaluate and collate details of the Disclosure and to provide a report to the Authorised Officer.
 - 6.3.2 Exercise due care and maintain proper record of all investigation evidences and papers
 - 6.3.3 To determine whether the case is genuine and warrant further attention
 - 6.3.4 Appoint a Designated Investigation Officer the assist in conducting the investigation
 - 6.3.5 To inform the Head of Human Resource to proceed with the appropriate disciplinary actions against the employee
 - 6.3.6 To present to the Grand Council on the summary of the investigation

- 6.4 Designated Investigation Officer
 - 6.4.1 Conduct Investigation
 - 6.4.2 Prepare and submit full report to Authorised Officer
 - 6.4.3 To treat any information shared during investigation as confidential

- 6.5 LGU as the owner of the Policy shall review the document at least on two (2) years or as and when required by the Management or the Grand Council to ensure the document is in compliance to the latest requirements/standard.

7.0 DISCLOSURE

- 7.1 Any person can make a Disclosure in accordance with the WPA. This includes:
 - 7.1.1 The CIIF's employees, including employees on contract terms, temporary or short-term employees and employees on secondment.
 - 7.1.2 Persons providing services to the CIIF including contractors and consultants.
 - 7.1.3 Members of the CIIF.

- 7.2 Anonymous disclosure may be considered at the discretion of the recipients. In exercising this discretion, the factors to be taken into account would include:
 - 7.2.1 the seriousness of the issue raised
 - 7.2.2 the credibility of the concern
 - 7.2.3 the adequacy of information provided by the whistleblower
 - 7.2.4 the possibility of confirming the allegation from other sources such as supporting document(s) enclosed with the disclosure

- 7.3 Although the Whistleblower is not expected to prove beyond reasonable doubt the truth of the disclosure, the Whistleblower shall need to demonstrate that there are reasonable grounds for his / her concern and provide sufficient information for the CIIF to take appropriate steps.

- 7.4 The Whistleblower shall not attempt to personally conduct any investigations, interviews or interrogations related to the matter being disclosed.

- 7.5 A Disclosure may be made if it relates to one or more of the following instances of Improper Conduct:
- 7.5.1 Bribery and receiving kickbacks
 - 7.5.2 Conflict of interest
 - 7.5.3 Corruption or fraud
 - 7.5.4 Criminal offence
 - 7.5.5 Embezzlement or theft
 - 7.5.6 Intimidation or bullying
 - 7.5.7 Forgery or alteration of any documents belonging to the CIIF
 - 7.5.8 Fraud or dishonesty
 - 7.5.9 Misuse of position
 - 7.5.10 Mismanagement and misuse of the CIIF's funds, assets or information
 - 7.5.11 Negligent conduct by staff
 - 7.5.12 Serious financial irregularity or impropriety within the CIIF
 - 7.5.13 Serious breach of the CIIF's Code of Conduct or other policies
 - 7.5.14 An act or omission which creates a substantial and specific danger to the lives, health or safety of the CIIF's employees or the public or the environment.
 - 7.5.15 Knowingly directing or advising a person to commit any of the above instances of Improper Conduct.
- 7.6 This Policy addresses Improper Conduct that relates to:
- 7.6.1 The conduct of an employee in breach of the CIIF's policies or procedures that would, if the employee is found guilty, constitute a Disciplinary Offence within the CIIF or a serious criminal offence; or
 - 7.6.2 The conduct of any person whether or not an employee of the CIIF, that would, if the person was found guilty, constitute a breach of agreement or relevant policies applicable to the person or a criminal offence under the relevant law.
- 7.7 This policy excludes any issues, complaints or concerns about:
- 7.7.1 Matters which are trivial or frivolous or malicious or vexatious in nature or motivated by personal agenda or ill-will;
 - 7.7.2 Matters covered by the grievance procedures;
 - 7.7.3 Matters pending or determined through the CIIF's disciplinary proceedings;
 - 7.7.4 Matters pending or determined through any tribunal, court, arbitration or other similar proceedings.
- 7.8 The Improper Conduct could occur in various ways at any place, including in the course of the CIIF's business or affairs or at any workplace i.e. any place related to the CIIF's business or affairs or during a conference attended by the CIIF Personnel in the course of his work or any time even outside of the CIIF's business time.
- 7.9 If CIIF Personnel is unsure as to whether a particular act or omission constitutes an Improper Conduct under this Policy, he is encouraged to seek advice or guidance from his supervisor or head of unit, or the Head of Human Resource Unit, or the Head of

Legal and Governance Unit or where necessary, the CEO. The personnel, however, should not discuss the matter with an external party.

- 7.10 A Whistleblower should come forward with any information or document that he, in good faith, reasonable believes discloses that an Improper Conduct is likely to happen, is being committed or has been committed.
- 7.11 The Whistleblower needs to demonstrate that he has reasonable grounds for the concerns. However, he is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a Disclosure. If he knows as a matter of fact that there are serious risks that an Improper Conduct is going to take place, such genuine concerns should be raised at that early stage.
- 7.12 Ideally, a Disclosure should be made as soon as possible after coming upon such information or document. Delaying the Disclosure may be detrimental to the Whistleblower as well as to any investigation and will make it harder for the CIIF to investigate, address and resolve the concerns.
- 7.13 Disclosures that do not allow the actual identity or information sufficient to contact the Whistleblower will not qualify for Whistleblower protection.

8.0 DISCLOSURE PROCEDURES

- 8.1 There are three ways of reporting or raising a disclosure/report:

8.1.1 Option 1: Online Submission

- a. The report or disclosure can be made through submission via e-mail to whistleblowing@ciif-global.org by completing the Whistleblower Reporting Form as **Appendix 2**. The disclosure shall include:
- a description of the improper conduct and the people/parties who are involved;
 - a background of the incident, including the relevant dates and location of occurrence;
 - how the improper conduct was detected;
 - reason(s) why the Whistleblower is particularly concerned about this (e.g. it may result in loss of the Group's assets/funds); and
 - particulars or production of documentary evidence and witnesses, if any.
- b. Notwithstanding the above, the disclosure by the whistleblower will still be accepted if he raises it directly in the email without using the form.
- c. The Whistleblower is encouraged to provide the pertinent of the Improper Conduct to facilitate the investigation.
- d. The online submission avenue will enable the Whistleblower to upload the relevant documents related to the case.

- e. The report, which will be securely encrypted, shall only be transmitted to and received by the Recipient to escalate the report to the Authorised Officer.

8.1.2 **Option 2: CIIF General Line**

- a. The Disclosure may also be made via CIIF General Line number 03-2632 5893. The call will be attended personally and available during office hours from 9.00 am to 12.30 pm and 1.30 pm to 5.30 pm, 5 days a week from Monday to Friday (with exception of Public Holiday).
- b. Call received outside the above operating hours, weekends, or Public Holiday will be diverted to a voice recording system, where the complainant may leave a message.

8.1.3 **Anonymous**

- a. Any whistleblower who wishes to report an improper conduct is required to disclose his identity to the CIIF in order for the Company to accord the necessary protection to him, as stated in clause 9.0.
- b. The CIIF reserves its right to investigate into any anonymous disclosure. However, any anonymous disclosure with inadequate information and no supporting document(s) will not be entertained.

8.2 The whistleblower must have first-hand knowledge of the information or facts of the concern or improper conduct, and not obtained from a third party or based on "hearsay". However, the whistleblower should not be discouraged from making a disclosure if he is unsure whether there is sufficient evidence to support the allegation.

8.3 Following are some tips on writing a good disclosure or report:

- 8.3.1 The whistleblower is to state his name and the accused person(s) or company.
- 8.3.2 The whistleblower shall have clear objective and reasonable basis for believing that the improper conduct he is reporting is illegal, improper or detrimental to the CIIF's interest.
- 8.3.3 Provide precise information such as date(s) and time of event(s), meeting(s) or correspondence(s) that have taken place or are going to happen, reference to relevant documents or policies, and other relevant facts.
- 8.3.4 The disclosure or report shall be brief but concise. Nevertheless, this does not limit the whistleblower to be specific on the detailed issues as this will eventually assist the investigating team.
- 8.3.5 Keep the tone neutral and based on matter of facts, rather than outraged, threatening, or harsh.
- 8.3.6 Use simple language and avoid any statement which could create confusion to the readers.
- 8.3.7 Provide documentary evidence, if available or necessary.
- 8.3.8 The whistleblower to affix his signature and date.

- 8.4 In the event that the WB who wishes to withdraw his Disclosure is required to write to whistleblowing@ciif-global.org together with supporting reason(s) for the withdrawal. Notwithstanding such withdrawal, the CIIF reserves the right to proceed with investigation on the matters arising from such Disclosure.

9.0 PROTECTION OF THE WHISTLEBLOWER

- 9.1 A Whistleblower who is an employee will be protected from any reprisal as a direct consequence of the disclosure subject to the conditions fulfilled as in point 9.3. In the event that the alleged wrongdoing is not subsequently proven, the Whistleblower will also be protected from reprisal subject to the conditions fulfilled as in point 9.3. The reprisal includes:
- 9.1.1 action causing injury, loss or damage
 - 9.1.2 intimidation or harassment
 - 9.1.3 interference with the Whistleblower's employment (eg: discrimination, disadvantage, discharge, demotion, suspension or termination)
 - 9.1.4 a threat to take any of the actions stated above.
- 9.2 Business associates/third parties of the CIIF and members of the public who become a Whistleblower will also be protected by the CIIF as to his / her identity subject to the conditions fulfilled as in point 9.3.
- 9.3 Protection to the Whistleblower will be accorded by the CIIF only when the Whistleblower satisfies all the following conditions:
- 9.3.1 The disclosure is done in good faith, and is not frivolous or vexatious or is not made with malicious intent or ulterior motive;
 - 9.3.2 The Whistleblower has disclosed his/her identity and contact details;
 - 9.3.3 The Whistleblower has not communicated the disclosure to any other party not related to the disclosure;
 - 9.3.4 The disclosure made is not for personal gain or interest.
 - 9.3.5 Upon making the disclosure the Whistleblower's identity will be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against the CIIF.
- 9.4 The identity and personal information of the Whistleblower and the alleged wrongdoer may only be revealed to persons involved in the investigation process.
- 9.5 An employee making allegations or reports that prove to have been made without good faith will be subject to disciplinary action (which may include termination of employment). In the case of customers, suppliers, subcontractors or consultants, continuity of business relationship shall be reviewed.
- 9.6 Any form of retaliation undertaken by an employee against any Whistleblower for reporting an irregularity in good faith is prohibited and considered to be in breach of the CIIF's Policy and Procedures. In such cases, disciplinary measures shall be taken

against the perpetrator in accordance of HDP Policy and Procedures, and if the deed of retaliation against the whistleblower is severe, the CIIF will assure the enforcement authorities will be also notified accordingly (subject to severity of the case/authorise committee's decision/cases related to corruption) so that individuals who require protection under the MACCA 2009 (Act 694) and WPA 2010 (Act 711) will receive protection, and confidentiality of information is guaranteed as allocated in the Acts.

- 9.7 Employees who consider that they have been the victim of retaliation for reporting an irregularity or have good reason to believe or fear that they are exposed to risk of retaliation as a result of their reporting an irregularity shall report the matter to the Head of Legal and Governance and request that protective measures be adopted. The protection against retaliation shall be extended to any other party associated with the employee.

10.0 REVOCATION OF PROTECTION

- 10.1 If after or during the course of an investigation into a Disclosure by a Whistleblower, it appears that:
- 10.1.1 The Whistleblower himself has participated in the Improper Conduct which is subject of the Disclosure;
 - 10.1.2 The Disclosure contained a material statement which the Whistleblower knew or believed to be false or did not believe to be true;
 - 10.1.3 The Disclosure of the Improper Conduct was frivolous or vexatious;
 - 10.1.4 The Disclosure of Improper Conduct was made solely to avoid dismissal or other criminal or disciplinary action; or
 - 10.1.5 In the course of making the Disclosure or providing further information, the Whistleblower commits an offence under the WPA 2010 and/or PDPA 2010.
- 10.2 Then the protection provided pursuant to Section 7 of the WPA, which is set out in Part 11 Subsection 11.4 above, will immediately be revoked, and the Whistleblower will be informed of this revocation in writing.

11.0 RECEIVING A DISCLOSURE/WHISTLEBLOWER REPORT

- 11.1 Upon receiving a Whistleblower report, the recipient shall review and evaluate a disclosure by a Whistleblower and to decide on the next course of action as soon as possible. This may entail obtaining further information, requiring an investigation to be conducted, making a police report or notifying the relevant regulatory authority. The details of the procedures can be referred in **Appendix 2**.
- 11.2 If the allegation is on any recipient or authorised officer, he/she shall be excluded from any further action pertaining to the allegation.
- 11.3 If an investigation is required, the recipient and authorised officer shall appoint a suitable employee/team/external investigator (“the Investigating Team”) to conduct the investigation and set a timeframe for the investigation to be completed. The

investigation shall be carried out by, and reported to, personnel who are not part of the role or function being investigated.

- 11.4 The Head of Legal and Governance or Head of Investigating Team, shall contact the Whistleblower whose identity was disclosed within 10 working days of receiving the report, explaining what actions will be or have been taken.
- 11.5 The Whistleblower shall also be informed of the following:
- 11.5.1 Not to contact the suspected employee(s) in an effort to determine facts or demand restitution;
- 11.5.2 Not to discuss the case, facts, suspicions or allegations with anyone except with the Investigating Team.
- 11.6 The Investigating Team shall conduct the investigation and upon conclusion of the investigation, or at key milestones, the Head of the Investigating Team shall submit a report on the findings and recommendation to the recipients for their discussion and deliberation on the next course of action to be taken. The said action shall be affected accordingly.
- 11.7 If a decision of the GC or any committee appointed by the GC is required, the Committee meeting or a GC meeting, as the case may be, shall be convened to deliberate on the matter and based on the decision made, the required action shall be affected accordingly.
- 11.8 Reporting Matrix on Whistleblowing are to be as follows:

Report Involved	Report's Recipient	Escalation to Authorised Officer
<ul style="list-style-type: none"> Head of Legal and Governance (IO) 	CEO & appointed GC or Chairman of a sub-committee	GC / MACC
<ul style="list-style-type: none"> CIIF Personnel All other parties 	Head of Legal and Governance (IO) & appointed GC or Chairman of a sub-committee	CEO / GC
<ul style="list-style-type: none"> CEO 		GC
<ul style="list-style-type: none"> GC 		MACC

12.0 CONDUCTING AN INVESTIGATION

- 12.1 The Investigation Team shall maintain objectivity, impartiality and fairness throughout the investigative process and conduct its activities competently and with the highest levels of integrity. In particular, the Investigation Team shall perform its duties independently from those responsible for or involved in operational activities and from employees liable to be subject of investigations and shall also be free from improper influence and fear of retaliation.

- 12.2 All investigations of whistleblowing reports received shall be conducted by the appointed Investigating Team only. The Whistleblower or any other personnel shall not attempt to conduct their own investigation.
- 12.3 The Whistleblower shall cooperate with the Investigating Team. Meetings may be arranged off-site, to protect the confidentiality of the Whistleblower.
- 12.4 Members of the Investigating Team shall have access to all relevant records. Documents provided for investigation purpose shall be acknowledged accordingly.
- 12.5 All CIIF Personnel are expected to cooperate and provide the necessary assistance to the Investigating Team. There should not be any attempt to deliberately destroy, alter or remove any documentary information or evidence.
- 12.6 The Investigating Team may decide to meet with the employee(s) under investigation and, if deemed appropriate, recommend temporary suspension from their current duties, until such time as the investigation either confirms their involvement in the improper conduct, or clears them of suspicion. Reference shall be made to the CIIF's policy and procedures on disciplinary action for procedures on suspension.
- 12.7 The Investigating Team may also schedule meetings with other persons suspected to have been involved or to have any knowledge of the alleged improper conduct. All such meetings shall be conducted confidentially, and all matters discussed shall be documented by the Investigating Team.
- 12.8 Upon completion of the investigation, the Investigating Team shall submit a written report of its findings and recommendation. The Investigation Report containing the following shall be properly documented:
 - 12.8.1 The specific allegation(s) of improper conduct (the findings of the investigation);
 - 12.8.2 Relevant information, supporting evidence obtained during the course of the investigation;
 - 12.8.3 the recommendation(s) for further steps to be taken or to improve internal controls, if any, based on the finding of the investigation; and
 - 12.8.4 Conclusions made and justification.
- 12.9 Any disciplinary action against any CIIF Personnel, the CEO or the GC shall be carried out in accordance with the HDP policy and procedures for disciplinary action and the Constitutions.
- 12.10 The offending CIIF Personnel shall be informed of the decisions made.
- 12.11 The Head of Legal and Governance or Head of Investigating Team shall notify the Whistleblower of the action that has been taken.

- 12.12 The recipients shall also notify the Audit Committee or the Grand Council, if deemed necessary, of the disclosure received, the outcome of the investigation and action taken. The factors to be taken into account include:
- 12.12.1 the seriousness of the issue raised; and
 - 12.12.2 the allegation is against any of the recipients or senior management.

13.0 CONSEQUENCE OF WRONGDOING OR WRONGFUL DISCLOSURE

- 13.1 If a CIIF Personnel is found to have:
- 13.1.1 Committed a wrongdoing; or
 - 13.1.2 Taken serious risks which would likely cause a wrongdoing to be committed; or
 - 13.1.3 Made a Disclosure not in accordance with the requirements of this Policy namely dishonest, mischievous or malicious complaints; or
 - 13.1.4 Participated or assisted in any process pursuant to this Policy in bad faith, the corrective action to be taken against the CIIF Personnel will be determined by the Grand Council or, if so delegated by the Grand Council, the CEO, which may include disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services with the CIIF or monetary or other form of punishment.
- 13.2 LGU will be responsible to appoint the solicitor for instituting the legal action against a CIIF Personnel or external party.
- 13.3 For any improper conduct involving external party, any existing contract with the CIIF must be terminated immediately. However, if the case involves a customer, the CIIF reserves the right to reject the application (before tabling for approval) or recall the facility (after approval or disbursement).
- 13.4 Senior Management must also take into account recommendations contain in the Investigation Report to prevent recurrence of the improper conduct.

14.0 RETENTION OF DOCUMENTS

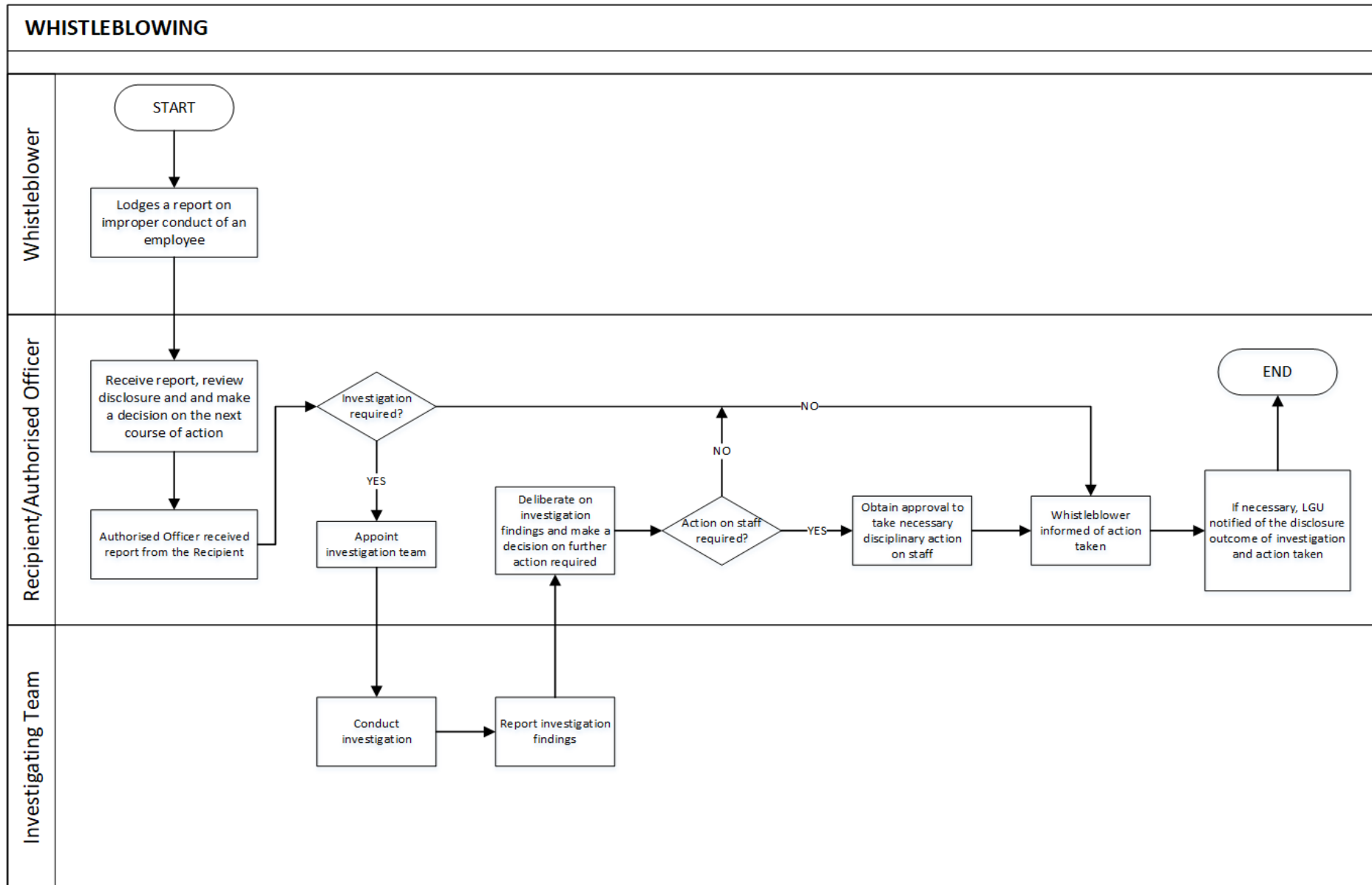
- 14.1 All records of disclosures shall be managed in compliance with the provisions of the Personal Data Protection Act 2010 and other applicable laws.
- 14.2 Notwithstanding the above, LGU will keep detailed records of all evidence gathered, interviews conducted, and all records received related to the investigation. In addition, if possible, to make softcopy of all the documents and upload in the LGU's folder.
- 14.3 All documents and evidence should be kept for 7 years, or until the case is closed, if the matter is brought to court.

15.0 COMMUNICATION

- 15.1 During the investigation stage, information on the case shall be restricted only to those who need to know of the matter, i.e. on a need-to-know basis. If need be, the Marketing and Strategic Communications Unit shall be roped in to prepare an appropriate statement for release to the public.
- 15.2 Employees involved shall be reminded to preserve the confidentiality of the matter.
- 15.3 The required announcement(s) as required by the regulatory authorities shall be made accordingly in compliance with the disclosure requirements of the relevant regulations.

- END OF POLICY -

APPENDIX 1: WHISTLEBLOWING PROCESS FLOW





APPENDIX 2: WHISTLEBLOWER REPORTING FORM

Name:			
Phone No:		IC No:	
Department (Staff only):		Email:	
<u>Details of Allegation/Concern</u>			
Person (s) Involved:			
Location:			
Date & Time:			
Incident/Details of Allegation:			
How Incident Was Detected:			
Evidence Available:			
Concern and/or Potential Impact of Allegation:			
Declaration: I hereby declare that the information provided herein is true to the best of my knowledge and belief and I have made this disclosure voluntarily. I understand that the CIIF will use the information provided for the investigation process.			
_____ Name:		Date:	