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ACLEDA Bank Plc.

ប្រជាធនាគារដែលលោកអ្នកជឿទុកចិត្ត

WHISTLE BLOWER'S PROTECTION POLICY

Date: September 18, 2014

1st Revised: February 15, 2018

Compliance Division






ACLEDA Bank Plc.

Policy Document

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Date: September 18th, 2014
1st Revised: February 15th, 2018

Responsibility	Name/Position	Signature	Date
Prepared and Submitted by:	Dr. In Channy , President and Group Managing Director		15 / 02 / 2018
Certified and Approved by:	For and On behalf of Executive Committee, Dr. In Channy , Chairman		15 / 02 / 2018
Certified and Approved by:	For and On behalf of Audit & Compliance Committee, Drs. Pieter Kooi , Chairman		15 / 02 / 2018

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WHISTLE BLOWER'S PROTECTION POLICY



Article 1. Purpose

ACLEDA Bank Plc. is recognized as "The bank you can trust, the bank for the people" through the provision of a full range of products and financial services to public and private sectors. ACLEDA Bank Plc. is committed to maintaining highest ethical standards, while maintaining transparency and accountability at all levels of operations. It is for this reason that ACLEDA Bank Plc. has adopted a Code of Ethics to ensure that all Directors and employees of ACLEDA Bank Plc. shall pursue the highest standards of ethical conduct in the interests of shareholders, customers, staff and the general public.

ACLEDA Bank Plc. is aware that despite the Code of Ethics incidents of unethical behaviour are likely to occur sometimes. This Whistle Blower's Protection Policy is a measure to identify such behaviour and take preventive and corrective actions in order to remove it. A whistle blower is defined by this policy as an employee who reports, to one or more of the parties specified in this policy under Article 4, an activity that he/she considers to be illegal, dishonest, unethical, or otherwise improper.

Employees are encouraged to disclose any concerns which, to the best of their knowledge, could be detrimental to the best interests of ACLEDA Bank Plc. and general public. These concerns may include but are not limited to:

- a) Non-compliance with the legal and regulatory framework;
- b) Non-adherence to internal policies and procedures of ACLEDA Bank Plc.;
- c) Financial abuse, stealing, fraud or other financial irregularities;
- d) Corruption or mismanagement;
- e) Behaviour that causes danger to health and safety of people;
- f) Improper conduct or unethical behaviour;
- g) Abuse of authority or any forms of harassment;
- h) Criminal or illegal activities, etc.

The purpose of this Policy is aimed at encouraging employees to communicate to the relevant officials in ACLEDA Bank Plc. any perceived behaviour which is unethical behaviour or non-compliance with the policies of ACLEDA Bank Plc.

Article 2. Objective and Scope

The objective of this Policy are:

- To protect each whistle blower who expresses a concern in good faith, without malice and with no expectations of personal gain. Such protection pertains to protection from any kind of retribution by another employee, and from disciplinary measures by ACLEDA Bank Plc.
- To encourages all employees to inform the relevant level of management of any activity or matter which is detrimental to the best interests of the organization or to the general public.

- The Board of Directors and the Executive Committee of ACLEDA Bank Plc. will take every effort to safe guard the person who made the disclosure to the full extent provided by the law.
- The Board of Directors and the Executive Committee are committed to a high standard of professional integrity, ethical behaviour, transparency in decision making and to the effective execution and implementation of the Policy.
- This Policy applies to all employees of ACLEDA Bank Plc and its subsidiaries. This policy must be readily accessible to all staff and should be part of any induction Programme for new Board members and new staff.
- This Policy may be adjusted for subsidiaries to reflect their specific regulatory and business environment.

Article 3. Principles

This Policy covers the following important principles

3.1. **Openness Principle.** ACLEDA Bank Plc. stimulates open communication policy, which enables all employees to express their concern regarding unacceptable behaviour, immediately after noticing such behaviour.

3.2. **Protection Principle.** All employees are guaranteed protection from informal pressure, persecution or retribution by any employee, and from disciplinary measures of the company, provided that the concern has been expressed in good faith, without malice and with no expectation of personal gain and is not the result of conduct by the individual seeking protection.

Retaliation or victimization of whistle blowers will not be tolerated. Retaliation includes, but is not limited to, any act of harassment, discrimination, adverse employment action or reprisal, direct or indirect, threatened or taken against a whistle blower by any person due to the disclosures made. The right of a whistle blower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Any whistle blower who believes s/he is being retaliated against must contact the Head of Compliance Division immediately.

3.3 **Confidentiality Principle.** The identity of the employee who reports suspected unethical behaviour will be kept confidential to the full extent allowed by the applicable law. However, the identity may have to be disclosed if crucial and material for the ongoing investigation, to comply with the law, or to provide accused individuals their legal rights of defense.

The whistle blower will be informed of any disclosures to be made under this policy prior to the disclosure. Any unauthorized disclosure of whistle blower information will be treated as major violation of work obligation and will be subject to disciplinary action.

3.4 **Implementation Principle.** All employees are guaranteed that any expression of concern, expressed in accordance with this policy and related procedures, shall be thoroughly investigated by ACLEDA Bank Plc.

Article 4. Responsibilities

- The Compliance Officer will be responsible to establish and implement the Operating Manual and Procedure within this Policy framework through which a whistle blower can disclose any concerns. Furthermore, if there is any concerns related to Head of Compliance Division, whistle blower shall contact directly to ACCO Board members via E-mail or Phone.
- The Operating Manual shall be approved by President & GMD and the Procedure can be approved by the Compliance Officer.
- The Management of ACLEDA Bank Plc. is responsible for ensuring that all employees of ACLEDA Bank Plc. are aware of and understand this policy.
- The Human Resources Division shall have the responsibility to ensure that all employees have full understanding of this policy and the relevant procedures.

Article 5. Disciplinary Action

Any breach of this Policy by any individual can result in disciplinary action in line with the Disciplinary Action Policy.

Article 6. Review and Effective Date

- This Policy will be periodically reviewed, and at least once a year, to determine its ongoing viability and applicability and to ensure that the implementing procedures of the Bank are structured to best ensure compliance.
- This Policy shall become effective on the approval signing date.

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