

Summary of Whistle Blowing Policy of AMK Microfinance Institution Plc

Approved by: Board of Directors

Approved on: 29-March-2022

1. REPORTING METHODS

An employee may raise his/her concern in writing or through oral communication by using one of the following methods.

A. Staff Suggestion Box:

- Branch Level: 2 staffs who is a Customer Service Officer or Teller or Account Admin or Credit Officer (“Collectors”) are assigned to collect letters/complaints from **Staff Suggestion Box**—but they are not allowed to open or read the letters/complaints—for forwarding to Chief Legal and Compliance Officer (Compliance Officer) within first week of each month.
- Head Office: 2 staffs in Legal and Compliance Department (“Collectors”) are assigned to collect letters/complaints from Staff Suggestion Box—but they are not allowed to open or read the letters/complaints—for forwarding to Chief Legal and Compliance Officer (Compliance Officer) within first week of each month.
- If there is no letter/complaint after opening, the Collectors are required to report as “No Letter/Compliant” in the month at every 1st week of next month.

B. Phone call via 1800 215 619 (free of charge) and 023 215 619 (regular fees): This voice mail will be sent to only Chief Legal and Compliance Officer (Compliance Officer).

C. E-mail to feedback@amkcambodia.com: This mail will be sent to only Chief Legal and Compliance Officer (Compliance Officer). If you wish to file a complaint against the Chief Legal and Compliance Officer (Compliance Officer), you can send an email to Chairman of Board Risk Committee at voe@amkcambodia.com.

D. Verbal Complaint to Chief Legal and Compliance Officer (Compliance Officer).

2. DESIGNATED RECIPIENT

All reports or complaints shall be filed through either one of the above methods which will reach one of the Designated Recipients named below:

Category	Designated Recipients
Category One: for reports or complaints against any personnel of AMK, up to senior management level (excluding members of Whistle Blowing Committee)	<ul style="list-style-type: none"> - Chief Legal and Compliance Officer - Whistle Blowing Committee (via Chief Legal and Compliance Officer)
Category Two: for reports or complaints against Chief Legal and Compliance Officer	<ul style="list-style-type: none"> - Chairman of Board Risk Committee
Category Three: for reports or complaints against any member of Whistle Blowing Committee (excluding Chief Legal and Compliance Officer)	<ul style="list-style-type: none"> - Chief Legal and Compliance Officer - Chairman of Board Risk Committee (via Chief Legal and Compliance Officer)

<p>Category Four: for reports or complaints against Chairman of Board Risk Committee or other directors of AMK</p>	<ul style="list-style-type: none"> - Chief Legal and Compliance Officer - Chairman of RNCG and Chairman of the Board of Directors (via Chief Legal and Compliance Officer)
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All reports/complaints raised through any methods mentioned above [except for reports/complaints against the Chief Legal and Compliance Officer (Compliance Officer)] will be directed to Chief Legal and Compliance Officer (Compliance Officer) only.

3. ROLES AND RESPONSIBILITIES

Board of Directors

- Approve the Policy as guiding principles and highest standard for whistleblowing cases.
- Oversee the implementation of the Policy and to ensure that the whistleblowing channels are still relevant and within best practices.

Board Risk Committee

- Accept report from Chief Legal and Compliance Officer on the number of reported cases of whistleblowing and outcomes of such reported whistleblowing cases which might include the investigation summary, outcome, penalty and future prevention plans.
- In the event the report or complaint was filed against Chief Legal and Compliance Officer (Category 2), the Chairman of Board Risk Committee shall be responsible or may assign any staff from Internal Audit Function and Risk Management Function or such other ad-hoc team as may be appropriate to perform the verification, evaluation and investigation in a confidential manner.

Designated Recipients

- Become main point of contact for receiving whistleblowing report from Whistle Blower, particularly on the wrong doing and alleged unethical behaviors and business misconducts of AMK's Personnel.
- Initiate the necessary course of action and/or disciplinary process after reviewing recommendation from Chief Legal and Compliance Officer, as the case may be, and considering finding/result of investigation, if any.

Chief Legal and Compliance Officer

- Arrange a discussion with the Whistle Blower for facts verification purposes or information gathering, if need be; and where documentary evidence is available to collate the same;
- Prepare a brief summary of the complaint if complaint was done through oral communication and the same to be confirmed by the Whistle Blower, if need be;
- If need be, initiate a preliminary review to determine if the disclosure appears to be justified and that the substance of the allegations is established; and
- Submit details of the allegation, and the findings from the preliminary review including the result of investigation (if any), to the Whistle Blowing Committee, Chairman of Board Risk Committee or Chairman of RNCG and Chairman of the Board of Directors, as the case may be, for deliberation.
- Share the outcome of the whistleblowing case with the Whistle Blower, if possible.

Internal Audit and Ad-hoc team

- If the complaint is related to violation of applicable laws, regulations, internal policies, procedures, fraud etc. and investigation is required, Internal Auditor or such other ad-hoc team, as may be appropriate, will be commissioned to undertake the investigation;

Human Resource

- If the complaint is related to staff misconduct, inappropriate or unethical behavior and investigation is required, HR Department or such other ad-hoc team, as may be appropriate, will be commissioned to conduct investigation.
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