



## **Whistleblowing Policy**

### **POLICY STATEMENT**

The Bank has zero tolerance on any form of misconducts or business violations, in line with the Codes and Shared Values.

As part of this commitment, all forms of fraud, bribery or corruption are unacceptable by the Bank, irrespective of the identity, ranking or position of the persons involved and any violations by its Personnel or its Business Partners are not be tolerated.

All fraudulent activities and bribery or corrupted acts are criminal offences and clear violations of the Codes and Shared Values (P.R.I.D.E.). Any behavior or activities which are contrary to the principles and values of the Bank, as well as in breach of any applicable Cambodian laws and regulations are strictly prohibited.

All employees are to continuously act in accordance with the highest standards of integrity, ethical behavior, professionalism, honesty and fairness, in the day-to-day business and operational dealings. All employees are also committed to prevent, deter and detect any forms of misconducts or unethical behaviors, not limited to frauds, anti-competition acts, personal data infringement, unauthorized disclosure of customers' information, bribery and corruption in connection with the Bank.

### **WHISTLE BLOWER PROTECTION**

The Bank recognizes that employees are the front-liners to most of the relevant information and normally the earliest to detect any misdeeds or malpractices within the Bank.

Some concerns may be inconsequential and may be resolved amicably. In contrast, there may be concerns that are presumably minor initially, which turns out to be more serious, involving criminal acts and may have adverse material impact on the Bank's reputation and financial position.

However, for fear of personal safety, discrimination and job security, they may not express their concerns in relation to any unlawful conducts or non-compliance matters, which may or have been committed by their colleagues or superior officers.

Whistle blower protection is specified under, but not limited to, the following Cambodian laws and regulation:

(a) Prakas on The Internal Control of Banks and Financial Institutions (2010), indicates that adequate and independent reporting lines shall be set up to handle whistle blowing confidentially. Individual protection rules shall be established to benefit all staff members acting in good faith and in the institution's overall interest.

(b) Article 13 of Law on Anti-Corruption (2010) clearly states that the Anti-Corruption Unit shall take necessary measures to keep the corruption whistle blowers secure.

## **WHISTLEBLOWING AVENUES**

(a) The reports and complaints shall be directed to the designated recipient as below:

E-Mail: [kh.whistleblowing@rhbgroup.com.kh](mailto:kh.whistleblowing@rhbgroup.com.kh)

(b) The Bank may also engage with external service provider(s) to be an authorized party, as the Bank's designated recipient, to receive the whistleblowing reports on behalf of the Bank, upon the Board of Director's approval.

(c) Any changes to the list of authorized designated recipients will be disclosed in related internal policies, guidelines and/or procedures, upon the Board of Director's approval.