

## WHISTLEBLOWING POLICY

### 1 OBJECTIVE

- 1.1 The Federation of Investment Managers Malaysia (FIMM) is committed to the highest standard of integrity, openness and accountability in the conduct of its business and operation. The objective of this policy is to provide an avenue for stakeholders to disclose any actual or potential improper conduct by FIMM's employees, directors, service providers/vendors or associated person (whistleblowing).
- 1.2 For the purpose of this Policy, "associated person" means an external party who:
- performs services for or on behalf of FIMM; and
  - interacts with external parties on behalf of FIMM.

### 2 SCOPE OF THE POLICY

The disclosure of any improper conduct includes but not limited to the following:

- Fraud;
- Bribery;
- Abuse of Power;
- Conflict of Interest;
- Theft or Embezzlement;
- Misuse of FIMM's Property;
- Breach of FIMM policies & procedures or any applicable rules.

### 3 PROCEDURES IN MAKING A DISCLOSURE

- 3.1 Any disclosure of improper conduct that concerns FIMM must be made in writing by completing the Disclosure of Improper Conduct Form ([click here](#)) and submit the same to:

Chairman of the Audit and Risk Committee (To be opened by addressee only)  
Federation of Investment Managers Malaysia  
19-06-1, 6<sup>th</sup> Floor, Wisma Tune  
No. 19, Lorong Dungun, Damansara Heights  
50490 Kuala Lumpur

- 3.2 Whistleblowers are advised to make their disclosures with sufficient details which include the following:
- the nature and detailed description of the improper conduct;
  - the name of individuals who have committed or are involved in the improper conduct; and
  - the 'how', 'what', and 'where' in relation to the improper conduct including supporting documents or evidence, if any.
- 3.3 The whistleblower must disclose his/her personal details such as name, telephone number and email address to enable the relevant parties conducting the investigation in FIMM to contact the whistleblower for further information.

- 3.4 Alternatively, the whistleblower may report the improper conduct directly to any enforcement agencies in Malaysia in accordance with and as defined under the Whistleblower Protection Act 2010 such as the Securities Commission Malaysia, Malaysian Anti-Corruption Commission, Polis Diraja Malaysia, etc. in the manner prescribed by the respective enforcement agencies.

#### **4. INVESTIGATION OF IMPROPER CONDUCT**

- 4.1 After receiving the disclosure of improper conduct, a designated person within FIMM will investigate the same in accordance with FIMM's internal policies and procedures.
- 4.2 If the outcome of the investigation results in a proven case of improper conduct and confirms the allegations, appropriate action, including disciplinary action will be instituted against the person alleged to have committed the improper conduct in accordance with FIMM's internal policies and procedures.

#### **5. PROTECTION TO WHISTLEBLOWER**

- 5.1 The whistleblower's identity shall be accorded with protection of confidentiality of identity unless otherwise required by law.
- 5.2 Such protection is accorded even if the allegations proved to be unfounded or mistaken.
- 5.3 There may be circumstances where the identity of the whistleblower may need to be revealed on a need to know basis (e.g. requirement to testify in court). If such situation arises, FIMM shall seek consent from the whistleblower accordingly.

#### **6. ACTING IN GOOD FAITH**

- 6.1 We expect whistleblowers to act in good faith and have reasonable grounds when reporting improper conduct. If allegations are proven to be malicious, the whistleblower responsible may be subject to appropriate action, including legal action, where applicable.