

WHISTLEBLOWING POLICY

1.0 INTRODUCTION

- 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.
- 1.2 In line with good corporate governance practices, FIMM provides an avenue for its employees and stakeholders to report or disclose any illegal, unethical, improper behaviour or conduct committed or about to be committed within FIMM (Improper Conduct), through established channels.
- 1.3 Only genuine concerns should be reported under the whistleblowing procedures provided in this policy. Such report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as gross misconduct.

2.0 OBJECTIVE

- 2.1 The objective of this policy is to:
 - a) Provide an avenue for any Whistleblower such as employees or stakeholders (Whistleblowers) to disclose any Improper Conduct in accordance with the procedures as provided for under this policy;
 - b) Provide protection to Whistleblowers from unfair dismissal, victimization, demotion, suspension, intimidation or harassment, discrimination, any action causing injury, loss or damage or any other retaliatory actions by FIMM;
 - c) Provide fair treatment to both the Whistleblower and the alleged person when a report of Improper Conduct is made;
 - d) Protect the long-term reputation of FIMM; and
 - e) Provide and maintain high transparency and accountability in the workplace.

3.0 SCOPE OF THE POLICY

- 3.1 This policy is designed to facilitate FIMM employees and its stakeholders to disclose and report any actual or potential Improper Conduct through a formal and confidential channel against FIMM's employees, directors, service providers/vendors or associated person as part of FIMM's commitment for effective risk management and high standards of governance and accountability.
- 3.2 For the purpose of this policy, "associated person" means an external party who:
 - a) Performs services for or on behalf of FIMM; and
 - b) Interacts with external parties on behalf of FIMM.
- 3.3 Improper Conduct includes but not limited to the following:

- a) Financial malpractice or Fraud;
- b) Corruption, blackmail or bribery;
- c) Abuse of Power;
- d) Conflict of Interest;
- e) Gross mismanagement within FIMM;
- f) Theft or embezzlement of FIMM's funds/resources;
- g) Misuse of FIMM's Property;
- h) Acceptance of gifts/favour beyond the permitted threshold by FIMM;
- i) Any breach of FIMM's Code of Ethics, policies and procedures, violation of laws, rules and regulations governing the business and operation of FIMM, etc.

3.4 For any suspected criminal offence, the Whistleblower is advised to make the necessary disclosure or report directly to the relevant competent authority to ensure he/she is given the appropriate protection under the laws.

4.0 PROCEDURE IN MAKING A DISCLOSURE

4.1 In the event of any Improper Conduct suspected, the Whistleblower is encouraged to contact the Chairman of the Audit and Risk Committee (ARC). This is to be done in writing by completing the **Disclosure of Improper Conduct form** ([click here](#)), sealed in an envelope with the label *"To be opened by addressee only"* and submit the same to:

Chairman of the Audit and Risk Committee
Federation of Investment Managers Malaysia (FIMM)
19-06-1, 6th Floor, Wisma Tune
No 19, Lorong Dungun, Damansara Heights
50490 Kuala Lumpur
Tel No: 03-7890 4242

Or alternatively, by emailing it to **integrity@fimm.com.my** where access to this dedicated email address is only confined to the Chairman of ARC.

4.2 The Whistleblower must identify himself/herself and disclose his/her personal details such as name, telephone number and email address to enable the relevant parties conducting the investigation within FIMM to contact the Whistleblower for further information and for FIMM to accord the necessary protection to him/her. Any anonymous disclosure may not be entertained. However, FIMM reserves its right to investigate into any anonymous disclosure.

4.3 The Whistleblower should also provide sufficient details in the disclosure of the Improper Conduct, specifying:

- a) Name of the Person(s) involved;
- b) Details of Improper Conduct (nature of the alleged misconduct with sufficient details and to attach any supporting documents);
- c) Date and Time of the Improper Conduct; and
- d) Place of alleged Improper Conduct.

- 4.4 Alternatively, the Whistleblower may report the Improper Conduct directly to any enforcement agencies in Malaysia in accordance with and as defined under the Whistleblowers 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.
- 4.5 Information based on “hearsay” will not be entertained. However, the Whistleblower should not be refrained from making a report because he/she lacks sufficient evidence to support his/her allegation.
- 4.6 A Whistleblower who wilfully makes a statement or discloses a complaint which he/she knew or believed to be false or did not believe to be true commits a misconduct and may be subjected to disciplinary action.
- 4.7 FIMM reserves its right to investigate into any allegation of Improper Conduct at its sole discretion and shall maintain all complaints received, tracking their receipt, investigation, and resolution. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.
- 4.8 FIMM may decide not to investigate a complaint/disclosure if in its opinion the complaint is:
- a) Trivial;
 - b) Frivolous or vexatious (e.g., devoid of merits or cannot be substantiated evidentially); or
 - c) The person does not have personal knowledge or a factual basis for the report of Improper Conduct.
- 4.9 If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

5.0 INVESTIGATION OF IMPROPER CONDUCT

- 5.1 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.
- 5.2 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.

6.0 PROTECTION TO WHISTLEBLOWER

- 6.1 The Whistleblower identity shall be accorded with protection of confidentiality of identity unless otherwise required by law or for the purpose of any proceedings by or against FIMM.

- 6.2 Any employee of FIMM who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any Improper Conduct committed or about to be committed within FIMM, to the extent reasonably practicable, provided that the disclosure is made in good faith.
- 6.3 Such protection is accorded even if the allegations proved to be unfounded or mistaken.
- 6.4 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. Under such circumstances, FIMM shall seek consent from the Whistleblower accordingly.

7.0 ACTING IN GOOD FAITH

- 7.1 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 subjected to appropriate action, including legal action, where applicable.