



## **WHISTLE-BLOWING POLICY**

For those of us involved in the management of staff, the implementation of a whistleblowing policy should be welcomed as an opportunity to encourage staff to play their part in improving the overall effectiveness and success of the organization. By creating an atmosphere of openness and trust, good employers can ensure that their organization as a whole is interested in eradicating unethical and illegal practices which previously may have been going on unnoticed.

### **1. Introduction**

POLIMA's Whistle-blowing system aims to reinforce the organization's commitment to its policies, values, attitudes and behaviors. The system provides an alternative channel to other reporting systems to learn of serious problems so that they can be resolved quickly.

### **2. Policy**

This policy applies to all staff of POLIMA and business partners to POLIMA. The policy covers the responsibility to report wrongful acts committed by staff of POLIMA. Wrongful acts in this sense are described as not follow POLIMA's Code of conduct.

### **3. Protection**

POLIMA will protect employees, who discloses information or raises a concern in good faith, from disciplinary actions.

A person who blows the whistle does not need to have firm evidence for expressing a suspicion. However, deliberate reporting of false or malicious information is forbidden. Abuse of the whistleblowing service is a serious disciplinary offence.

We encourage anybody who shares a concern to be open with their identity. All messages received will be handled confidentially.

### **4. Reporting Responsibility**

It is an obligation for all POLIMA staff to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy. Staff of Partner organizations are also required to report such acts committed by POLIMA staff or their own staff in the execution of their Partnership agreements. Reports can be made as follows

- Any employee of POLIMA or business partner who observes any improper practice or wrongful conduct on the part of a POLIMA staff should report such observations to the closest manager.
- If the alleged wrongdoing relates to the closest manager, the case shall be reported to the General Manager.
- Where the alleged wrongdoing relates to the General Manager it shall be reported to the CEO

### **5. Handling of Reported cases**

The manager who receives a report will acknowledge receipt of the report within seven business days.



All reports should be properly investigated by CEO and/or GM.

Upon investigation, Management should take the appropriate corrective action warranted by the outcome of the investigation.

The Whistle-blower would also be notified of the outcome of an investigation whenever it is possible to do so. On an annual basis, issues raised through whistle-blowing will be tracked.

#### **6. Notification**

All departmental heads are required to notify and communicate the existence and contents of this policy to the employees of their department and all new employees respectively.