



WHISTLEBLOWING POLICY

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Introduction	It is a good management practice to have a process in place whereby employees are able to raise concerns about activities of an organization and especially where such activities are not in the best interest of an organization. The policy will also help to reduce informal and negative grapevine and rumour mongering.
What to report	<p>Every employee is responsible for reporting any conduct within the bank that the employee reasonably believes tends to show one or more of the following: -</p> <ul style="list-style-type: none"> (a) That we are/ have been in serious breach of (or are likely to breach) any applicable law or regulation; or (b) That a criminal offence has been committed/ is being committed/ is likely to be committed or any other actions are being contemplated which otherwise might constitute criminal behaviour (including behaviour that might constitute fraud with respect to accounting matters or to financial or regulatory reporting); or (c) That it is significantly detrimental to Family Bank or any of its employees; or (d) That it involves questionable accounting practices or any other financial impropriety by employees; or (e) That it constitutes a serious breach of applicable internal policy; or (f) That it endangers the health and safety of employees; or (g) That it deliberately conceals any of the above activities. <p>The following are examples of issues that staff can report: -</p> <ul style="list-style-type: none"> • Money Laundering • Mistreatment of customers • Abuse of office • Fraud • Sexual harassment • Neglect of duty • Falsified accounting • Concealment of losses to portray better performance • Misuse of company assets • Reckless lending
Medium of reporting	<p>The bank will develop an automated solution through which staff will speak up. The solution will be outsourced to assure staff that the issues they raise will be treated with utmost confidentiality.</p> <p>To promote confidentiality, the CEO & Managing Director will see to it that information provided by whistleblowers is treated with utmost confidentiality.</p> <p>On the other hand, this policy requires that whistleblowers should use their office e-mails to communicate their issues in an effort to promote responsible whistleblowing.</p>

Actions after reporting	<p>All matters that will be reported will be logged and escalated to the Director of HR with a copy to the CEO. The two will then discuss and take any or a combination of the following actions within a period of 7 days.</p> <ul style="list-style-type: none"> • Deal with the matter to conclusion • Refer the matter to the board • Delegate closure to a departmental head • Start a disciplinary process.
Escalation to the Board	<p>Matters that are fully investigated and are found to incriminate Senior Management will always be brought to the attention of the Chair of the Board HR committee for action.</p>
Reporting in good faith	<p>All employees must conduct themselves truthfully, in good faith and without fear of reprisal or any other detrimental or discriminatory action against them.</p> <p>Conversely, if it is subsequently found that the employee has knowingly submitted a false report with the intention to accuse another employee or for other malicious reasons, the matter will be dealt with as per the existing disciplinary procedures.</p> <p>A staff who speaks up may be called upon to give further details or evidence.</p>
Feedback to Whistleblowers	<p>The Director of HR will give feedback to whistleblowers as follows:-</p> <ul style="list-style-type: none"> • Within a period of 7 days of receipt of the report, the director of HR will acknowledge receipt. • Once investigations are done, the whistleblower will get additional feedback on the results of investigations. If the staff who was being investigated is found guilty, the whistleblower will be informed of what action management or the board has taken on the staff involved.
Awareness & assurance	<p>A communication to staff will be done by the HR Director on the operationalization of speak up policy and a copy posted to the intranet for referral. In the same communication, staff will be assured that identity of whistleblowers will never be disclosed and that they will never be victimized for any reporting. Staff will also be sensitized on the need for responsible reporting.</p>

Approvals

<p>Document Author/ Policy Owner</p>	<p>Risk Department</p>	<p>Signature.....</p> <p>Date.....</p>
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<p>Management Approval</p>	<p>Executive Committee</p>	<p>Chairman, EXCO</p> <p>Signature.....</p> <p>Date.....</p>
<p>Board Committee Approval</p>	<p>Board Risk Management Committee</p>	<p>Chairman, BRMC</p> <p>Signature.....</p> <p>Date.....</p>
<p>Full Board Approval</p>	<p>Board Risk Management Committee</p>	<p>Chairman, Full Board</p> <p>Signature.....</p> <p>Date.....</p>