SUMMARY OF WHISTLE BLOWING PROGRAMME PROCEDURE

OCBCNISP Information Classification: Public

I. BACKGROUND

Abuse of authorities, fraud incidents, Code of Conduct violations or breach of policies and procedures committed by Bank staff(s) will become serious threats to sustainability of the Bank's business. Negative impacts can be raised from these events such as financial loss, reputation risk, legal risk and other impacts. Bank has established the control process to prevent or detect these incidents so that it can be managed immediately and appropriately to minimize any potential negative impacts.

II. PURPOSE OF WHISTLE BLOWING PROGRAMME PROCEDURE

The purposes of whistle blowing programme procedure are:

- 1. Increase staffs risk awareness to prevent fraud.
- 2. Encourage staffs to raise any abuse of authorities, fraud incidents, Code of Conduct violations or breach of policy and procedures committed by staffs from lowest to the highest level without being worried or afraid of getting any threats or sanctions from any parties.
- 3. Provide ability for the Bank to identify and examine any incidents immediately and protect whistle blower identity; maintain security and confidentiality of any information raised.
- 4. Establish protection for whistle blower against threats from any parties (Whistle blowing Protection Programme).

III. WHISTLE BLOWING REPORTING CHANNEL

The reports can be raised through following channel:

- a. Website <u>https://whistleblowing.ocbcnisp.com</u>.
- b. Email <u>whistleblowing@ocbcnisp.com</u>. The recipients of the mailing list are Internal Audit Division Head, Handling Fraud Team Head Office, Human Capital Service Division Head and Operational Risk Management Division Head.
- c. Email to Internal Audit Division Head, Handling Fraud Team Head Office, Human Capital Service Division Head and Operational Risk Management Division Head.
- d. Addressed to the President Director or President Commissioner if whistle blower feels uncomfortable to raise to the appointed officials.

	>	Handling Fraud Team
Whistleblowing Concerns (Report)	>	Internal Audit Division Hea
	\longrightarrow	Human Capital Service Division Head
		ORM Division Head
		ORIVI DIVISION Head

IV. WHISTLE BLOWING PROTECTION PROGRAMME

Bank has Whistle blowing Protection Programme to protect and ensure/monitor that whistle blower will not incur loss after raising their report such as threats, termination, demotion, exile, and unfair treatment during report is being raised and thereafter.

V. WHISTLE BLOWING HANDLING

Investigation

All reports received will be investigated by an independent unit (Fraud Handling Team).

• Reporting

The whistle blowing statistical report is tabled at Fraud Council, the Board Risk Committee, and the Risk Monitoring Committee. Whistle blowing reports that have a significant impact will also be promptly reported to the President Director.

Sanctions
 The Bank imposes strict sanctions on the involved staffs through Disciplinary Council.

VI. WHISTLE BLOWING MANAGEMENT

Four parties involved in whistle blowing management:

- 1. Fraud Handling Team: to investigate all whistle blowing reports.
- 2. Human Capital Services Division Head: to provide protection to whistle blower.
- 3. The Disciplinary Council to impose sanctions on involved staffs.
- 4. Operational Risk Management: to administer the investigation report and to coordinate with relevant unit in preparing improvements and mitigation actions.