

# **I&M HOLDINGS LIMITED** **WHISTLEBLOWING POLICY**

## **1 Preamble**

I&M Holdings Limited and its Subsidiaries (the “Group”) is committed to the highest standards of openness, probity and accountability. In line with that commitment the Group expects employees, and others that we deal with, who have serious concerns about any aspect of the Group companies work to come forward and voice those concerns. It is recognized that most cases will have to proceed on a confidential basis.

An important aspect of accountability and transparency is a mechanism to enable staff of the Group to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer’s affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the Group then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told). The Group is committed to ensuring that no members of staff should feel at a disadvantage in raising legitimate concerns.

## **2) Aims and Scope of this Policy**

This policy is designed to enable employees of the Group to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. These concerns could include;

- Failure to comply with a legal obligation or statutes
- Criminal activity
- Improper conduct or unethical behavior as quoted in the Bank’s Code of Conduct.
- Conduct which is an offence or a breach of law
- Disclosures related to miscarriages of justice
- The unauthorized use of the Company or its subsidiaries funds and assets.
- Possible fraud and corruption
- Attempts to conceal any of the above.

This policy aims to:

- Encourage employees to feel confident in raising their apprehensions and to question any act that may raise concerns about practice that may bring disrepute to the Group and or cause financial or other loss to the Group and or any malicious act that may adversely affect a staff member.

- Provide avenues for employees to raise those concerns and receive feedback on any action taken
- Reassure employees that they will be protected from possible reprisals or victimization if they have reasonable belief that they have made any disclosure in good faith.
- Minimize the Group's exposure to the damage that can occur when employees circumvent internal mechanisms.
- Let employees know the Group is serious about adherence to the code of conduct and the Group's policies.

### **3) Policy Principle**

- 1) Employees are often the first to realize that there may be something wide of the mark within the Group. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company and its subsidiaries. They may also fear harassment or victimization. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.
- 2) The policy document makes it clear that an employee can do so without fear of victimization, subsequent discrimination or disadvantage. This whistle-blowing policy is intended to encourage and enable employees to raise their apprehensions **within** the Group rather than overlooking a problem or 'blowing the whistle' outside.
- 3) As an employee, there are existing procedures in place to enable you to lodge a grievance relating to your own employments as per the provisions in the policy and procedure manuals at the subsidiaries. The Whistle blowing Policy is thus intended to cover major concerns that fall outside the scope of the procedures.

### **4) Policy Application**

The policy applies to all employees of the Group.