

KCCDFI MBA CORPORATE GOVERNANCE MANUAL 2019

WHISTLEBLOWING POLICY

INTRODUCTION OF PURPOSE

KCCDFI Mutual Benefit Association, Inc. Code of Ethics and Conduct requires Trustees, officers, employees, and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The aim of this Policy is to enable any concerned individual to report and provide information, anonymously if he/she wishes, and even testify on matters involving the actions or omissions of the Trustees, Officers Personnel, and members-stakeholders that are illegal, unethical, violate good governance policies, neglect or abuse of clients, possible fraud and corruption, and unhealthy business practices.

SCOPE

This policy shall be applicable to all Trustees, officers, personnel, and members-stakeholders. The policy is intended to enable those who become aware of wrongdoing in the Association affecting some other person or services to report their concerns at the earliest opportunity so that they can be properly investigated.

It is the responsibility of all trustees, officers and personnel to comply with the Code and to report violations or suspected violations in accordance with this Whistleblowing Policy.

REPORTABLE CONDITION

Whistleblowers may report to the Management or otherwise to the Compliance Officer such acts or omission that are illegal, unethical, violate good governance policies, neglect or abuse of clients, possible fraud and corruption, and unhealthy business practices are grossly disadvantageous to the Association.

Whistleblowers may also submit whistleblowing reports to the Management or Compliance Officer through the following channels:

- E-mail : kccdfi_mba@yahoo.com.ph
- Post Mail : 2nd Flr., KCCDFI Bldg. MCLL Highway,
Guiwan, Zamboanga City
- Hotline Numbers : (062) 990-2429
0955-579-3477 / 0955-579-3476

CONFIDENTIALITY

All violations or suspected violations may be submitted on a confidential basis by the complainant. It shall treat all report, including the identity of the Whistleblower and the person/s complained of, in a confidential and sensitive manner to the extent possible, consistent with the need to conduct an investigation. The Whistleblower's identity will be kept confidential, unless compelled by law or the courts to be revealed.

PROTECTION AGAINST RETALIATION

No trustees, officer, employee or member who in good faith reports a violation of the Code shall suffer discrimination or harassment in the workplace, retaliatory acts, or adverse employment consequence.

If the Whistleblower has reasonable ground to believe that such retaliatory acts are being directed against him/her may report the same to the Management for extension of all possible assistance under the law.

AUDIT MATTERS

The Audit Committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

HANDLING OF WHISTLEBLOWING REPORTS

The Compliance Officer will notify the complainant and acknowledge receipt of the reported violation or suspected violation within 5 working days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.