

## Whistle-Blowing

### Purpose

AFI is committed to enhance its corporate governance to safeguard the integrity of the organization from any wrongdoing or malpractice. In furtherance of this commitment, all AFI employees are required to conduct themselves with a high standard of integrity and professionalism in the conduct of business and professional activities.

As part of its commitment to good governance, AFI has established a Whistle-Blowing Policy that provides the procedure for raising legitimate concerns to enable objective investigation and redress. The policy enables individuals to raise, in confidence and without fear of retribution, concerns about fraud, corrupt practice, abuse of funds, harassment, discrimination or violation of the dignity of others in AFI or any serious violation of written law by staff in any jurisdiction they are deployed or assigned to work.

### Whistle-Blower

The Whistle-Blower is to provide the information and evidence relating to a wrongdoing or malpractice committed which is reasonably believed to be true and is doing so in good faith.

In order to avoid any baseless or vague proofs that cannot be verified, any complaint received from an anonymous source will not be administrated.

### Reporting Channel

If a Whistle-Blower believes reasonably and in good faith that a wrongdoing or malpractice has happened, the Whistle-Blower can make a disclosure in writing.

Whistle-Blower is strongly encouraged to first raise the concerns with his or her manager in order to give an opportunity to put matters right. However, if the Whistle-Blower believes that the case is strong and has sensitive concerns or has compelling reasons such as a conflict of interest, the Whistle-Blower should then make a disclosure or complaint in accordance with the Whistle-Blowing Policy.

Disclosure or complaint should be factual rather than speculative and contain as much specific information as possible and documentary proof to allow for a proper assessment of the nature, extent and urgency of the matter that is the subject of the complaint. Each actual or suspected wrongdoing is to be reported separately.

### Who should raise a concern?

Anyone has the right to whistle blow on all matters involving AFI employees wherever assigned, consultant, service provider, contractor or supplier, members and the general public.

### Making a disclosure

AFI is committed to be a model global organisation and will seriously handle any whistle-blowing report in good faith. Reports can be submitted at:

[Whistle-blower@afi-global.org](mailto:Whistle-blower@afi-global.org);

or

In writing to any member of AFI Management or Executive Leadership Team;

or

the Chair of the AFI Board of Directors where the matter involves the Executive Leadership Team;

or

Alternatively, the Whistle-Blower may report directly to relevant government or regulatory authorities and enforcement agencies in country of AFI official assignment.

### **Commitment to Inquire Into Disclosure or Complaint**

AFI commits to thoroughly investigate any Whistle-Blower concern and to take action where the concern is verified. To facilitate an investigation into the alleged wrongdoing, where possible and applicable, the following information should be included when making a disclosure:

- a) The alleged event, matter or issue;
- b) the date and location of the incident;
- c) the identity of the wrongdoer;
- d) particulars of witnesses, if any;
- e) supporting evidence and/or documents where available; and
- f) Other details deemed to be useful to facilitate the investigation.

Where possible and to guard against malicious concerns, the Whistle-Blower is encouraged to disclose their personal details to enable the relevant parties conducting the investigation to contact the Whistle-blower for further information and also provide a feedback on the outcome:

- a) Name; and
- b) contact details - email address and/or telephone number. AFI commits to ensure that all disclosed information, including the identity of the Whistle-Blower shall be treated with strict confidentiality.

### **Confidentiality of Information and Protection of Whistle-Blower**

AFI is committed to protect the Whistle-Blower from all acts of harassment, retaliation, victimization, and recrimination arising from making the disclosure in good faith. All personnel, assigned directly or indirectly to investigate a whistleblowing case, shall strictly protect the identity of the Whistle-Blower and witnesses from unauthorized disclosure before, during and after an investigation.

In circumstances where the identity of the Whistle-Blower may need to be revealed on a need-to-know basis (e.g. need to testify in court), AFI shall discuss and seek consent of the whistle-blower before proceeding with the case.

The protection will be removed if it is found that the Whistle-Blower was also involved in the improper conduct, or if the Whistle-Blower is found to have made the disclosures in bad faith.

Responsibility of the Whistle-Blower includes:

- a) should make the disclosure in good faith;
- b) should reasonably believe that the information and allegations are true; and
- c) should not act for personal gain. If the case involves the complainant's personal interests, it must be declared at the outset.