

Frequently Asked Questions relating to Whistleblowing Programme**A. ABOUT WHISTLEBLOWING****Q1: What is “Whistleblowing”?**

Whistleblowing is an act of voluntary disclosure of information about any improper conduct committed or about to be committed by an employee of the Bank in good faith; be it suspected, attempted, actual or perceived to happen.

Q2: Who can be a Whistleblower?

A director, an employee of the Bank and a 3rd party (i.e. customers, former employees, interns, associated persons, or members of the public that to a certain extent may have business dealing or contractual relationship with the Bank), who makes a disclosure against a director or employee of the Bank about his/her involvement of any suspected, attempted or actual improper conduct.

Q3: What is Whistleblowing Policy?

This Policy sets out avenues for reporting concerns about improper conducts. It also defines the fundamental principles of whistleblowing; such as ensuring fair treatments by providing the utmost protection to individuals who report improper conducts in good faith and by protecting the basic rights of any person implicated by the reported incidents.

Q4: Why is Whistleblowing Programme important to the Bank?

Whistleblowing allows the Bank to promptly investigate and address improper conduct involving its employees before serious damage is caused. This may help to preserve and build the Bank’s integrity and credibility to all its stakeholders. Also, it helps to reinforce a good corporate governance environment; where employees are allowed to whistleblow without the risk of reprisal; and be assured that their concerns will be addressed seriously.

Q5: What types of “Improper conduct” can I report?

Improper conducts refer to illegal, unethical or questionable practices or activities which shall include but not limited to the following:

- a) any fraud, unlawful civil or criminal act;
- b) bribery and corruption;
- c) any misappropriation of assets of the Bank including embezzlement, stealing assets of the Bank, causing the Bank to pay for goods or services not received by the Bank and so on;
- d) any bullying or harassment which occurs at work and out of the workplace, including on business trips or at work-related events or social functions;
- e) any act of dishonesty, abuse of power/authority for personal gain;
- f) any falsification of management or financial information
- g) any gross mismanagement or dereliction of duties that may adversely impact the financial position or reputation of the Bank
- h) any act of deliberately concealing any of the foregoing; and
- i) any misdemeanour, misconduct or negligence or breach of Code of Conducts, or violation of the terms and conditions of service or the rules and regulation of any of the regulatory authorities and/or the Bank.

Q6: I have been bullied/harrassed at work. Is my concern considered as employee's grievances (which is not covered under the Whistleblowing Policy)?

No, any bullying or harassment which occurs at work; or even out of the workplace (e.g. during business trips or at work-related events or social functions), is considered as one of the reportable improper conducts. The Bank encourages employees to whistleblow any incidents related to bullying and harassment in nature.

B. PROTECTION ACCORDED TO WHISTLEBLOWER

Q7: Is the identity of the Whistleblower protected?

Yes, the Whistleblower's identity will be kept confidential at all times and will only be known by the designated recipient, unless required to be disclosed under the provisions of the law. He/She is also protected against any acts of victimisation, discipline or retaliatory action by reason of having made a whistleblowing report. However, the protection will be lifted if the Whistleblower is found to have made the disclosures in bad faith.

Q8: What if I get unfairly treated or face retaliatory action from others who suspect me of being the Whistleblower?

If the Whistleblower reasonably believes that he/she has been unfairly treated or subjected to certain form of reprisals for having made a whistleblowing report, the Whistleblower shall report his/her concern to the designated recipient. If the act of retaliation is committed by an employee of the Bank, the management will institute the necessary disciplinary action. However, if the act of retaliation is committed by an external party and if it's proven, the Bank may take action to hold the external party accountable including instituting civil and/or criminal actions against him/her in the court of law.

C. CHANNELS OF WHISTLEBLOWING & INVESTIGATION

Q9: How do I whistleblow an improper conduct?

You shall report the improper conduct in writing by using the Whistleblowing Report Form to the Designated Recipients as shown in the table below. The report must provide full details of the improper conduct and where possible, with the documents or supporting evidences.

Position	Designated Recipients	Contacts
Chief Internal Auditor	Mr Kee Chin Teck	Address: Level 10, Menara Maxis, Kuala Lumpur City Center, 50088 Kuala Lumpur. <i>(Strictly Confidential And To Be Opened By The Addressee Only)</i> Email: keechinteck@my.icbc.com.cn

Position	Designated Recipients	Contacts
Chairman of AC	Mr Chin Chee Kong	Address: Level 10, Menara Maxis, Kuala Lumpur City Center, 50088 Kuala Lumpur. <i>(Strictly Confidential And To Be Opened By The Addressee Only)</i>
Chairman of the Board	Mr Chang Zhenwang	Address: 55, Fuxingmennei Avenue, Xicheng District, Beijing, 100140 China. <i>(Strictly Confidential And To Be Opened By The Addressee Only)</i>

Q10: Am I required to reveal my identity for whistleblowing (or is anonymous reporting allowed)?

Q Not necessarily. The Bank encourages the Whistleblower to raise his/her concern in writing (and supported with personal details) by using the Whistleblowing Report Form.

However, the Whistleblower may also raise his/her concern anonymously (but such manner is not encouraged). It is important to note that anonymous reporting may hinder or complicate the investigation due to the constraint in obtaining further information and clarification from the whistleblower which could limit the scope of the investigation.

Q11: Can I withdraw a formal disclosure made earlier to the Designated Recipient?

Yes, technically the Whistleblower is allowed to do so. However, depending on the seriousness of the case, the Designated Recipient may or may not call off the investigation process.

Q12: Can I make an external disclosure?

Yes, the Whistleblower may choose to file a whistleblowing report externally. However, he/she will lose the protection under the Bank’s whistleblowing programme; and potentially subject to the risk of violating the relevant acts e.g. Financial Services Act which prohibits the disclosure of confidential information.

D. ASSISTANCE IN THE INVESTIGATION

Q13: Is the Whistleblower required to assist in the investigation of the concern raised?

Maybe. Where required, the Whistleblower may be contacted to assist in the investigation (e.g. to provide more details/information relating to his/her concern raised).

Q14: Would the Whistleblower be informed of the outcome of the disclosure/concern raised?

Yes, the Whistleblower will be informed in writing of the investigation outcome within 14 days by the designated recipient upon deliberation of the investigation result by the Audit Committee.

Q15: What is the meaning of a disclosure made in good faith?

It simply means that the disclosures which are made under sincere belief without any bad intention, malicious motive or intent to damage one's reputation or office and the disclosures are made in the best interest of the Bank or members of the public.

Q16: Will any action be taken against the Whistleblower if the outcome of the investigation shows no improper conduct has been committed?

It depends. As long as the disclosure is made in good faith, the Whistleblower will not be affected. However, in the event that it is discovered that such disclosure was made with malicious/ill intent to injure the reputation of the person against whom the disclosure was made, appropriate actions including disciplinary action or legal action can be taken against him/her.

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