



ARM Pension Managers (PFA) Limited

WHISTLEBLOWING POLICY

Executive Summary



WHISTLEBLOWING – Policy (Executive Summary)

A. Definition

Whistleblowing is the act of disclosing or raising concerns about misconduct or other actions affecting the ARM Pension Managers, or occurring within the Company, and which could endanger the Company and its employees or threaten its Client's, Shareholders or the public.

B. Objectives

- To provide a safe avenue for escalating suspected misconduct without fear of reprisal
- To serve as a tool for the identification of risk events
- To reinforce ARM's zero tolerance to fraudulent, illegal and unethical conduct

C. Reportable Misconduct

- Conduct that is against ARM Pensions code of conduct, rules, procedures, and policies, or established standards of practice;
- Conduct that amounts to fraudulent or illegal act as defined within the ARM Pensions Anti-Fraud Policy including theft and corrupt practices
- Unethical conduct according to ARM Pensions Code of Business Conduct & Ethics.
- Conduct that amounts to misuse of ARM Pensions' resources, including business information;
- Conduct that makes you feel uncomfortable in terms of your experience with the standards you believe the Company upholds;
- Conduct that amounts to willful or negligent instances of non-performance of duties, including abuse of office;
- Health and safety violations
- Conduct that amounts to an attempt to conceal any of these actions.

D. Confidentiality

All information obtained from a Whistleblowing Report would be considered Confidential and would not be disclosed or discussed with other persons, except for the purpose of an investigation or where the Company has a legal or regulatory obligation to disclose.

Any breach of this Confidentiality would be treated in accordance with the Disciplinary Process as stipulated within the ARM Pensions Staff Manual.

E. Whistleblower Protection

An individual making a Whistleblowing Report in good faith may do so without fear of reprisal or prejudice. However, this protection is forfeited if it is found that the report was deliberately falsified or made with malicious intent.

F. Whistleblowing Channels

- OpRisk Manager – Whistleblowing Portal
- ARM Pension Website – Whistleblowing Portal (www.arpension.com)
- Dedicated Phone line

G. Minimum Information Required for a Whistleblowing Report

1. Name of officer(s) involved
2. Nature of Misconduct (Fraudulent/Illegal Conduct, Unethical Conduct, Internal Procedural Breach, Regulatory Compliance Breach, Health & Safety Risks, Abuse of Office, Misuse of Company Resources, Wilful Negligence, Others)
3. Date of Occurrence
4. Estimated value of loss to the Company (if any)
5. Specific evidence of occurrence of the Misconduct

H. Confidential & Anonymous Whistleblowing

1. **Confidential Whistleblowing:** A whistleblower is encouraged to reveal his or her identity when a report or disclosure is made using any of the channels mentioned above. This approach helps the investigation significantly, as the Whistleblower can be contacted to provide further details on the report, where necessary.
2. **Anonymous Whistleblowing:** However, a whistleblower may choose not to reveal his or her identity upon making a report. With the reporter's anonymity thus assured, the identity of the reporter cannot be ascertained by anyone. Should this approach be chosen, the Whistleblower must ensure that enough information is provided to enable a thorough investigation.

I. Investigation

Instances of suspected fraud and corrupt activities shall be investigated in accordance with the ARM Pensions Anti-Fraud Policy. All other instances of misconduct shall be assessed by the Risk Management Unit and referred to the appropriate Unit for investigation and necessary action. The Risk Management Unit shall follow-up to ensure that the report is properly investigated and adequately addressed.

The whistleblower may seek follow-up information about the investigation of a report, escalated using the confidential whistleblowing option, or any consequent action taken by ARM Pensions.