



Grievance Recourse / Whistleblowing Policy

POLICY	Grievance Recourse / Whistleblowing Policy
AUTHOR	Managing Director
RECIPIENTS	All

DATE	VERSION	DESCRIPTION	AUTHOR
11/7/2018	V0.1	Initial version	MD

OBJECTIVES
<ul style="list-style-type: none">○ Ensure that all staff of Easy Microfinance operate in compliance with the law and with the values of the Company.○ Enhance good governance and minimize risks of fraud, corruption and reputational damage of Easy Microfinance○ Provide the necessary means to employees and external stakeholders for them to be able to disclose information relating to fraud, corruption or any other misconduct and for them to get a proper response from the people in charge.○ guarantee that the whistleblower will be protected from any adverse consequences for reporting improprieties;

Easy Microfinance is committed to provide a grievance recourse / whistleblowing environment where all employees and external stakeholders with serious concerns about Easy Microfinance and its activities and operations may come forward and voice these concerns with the assurance that swift action will be taken if necessary. The application of this grievance recourse policy means that that:

Easy Microfinance shall:

- Ensure that any employee and third party have an unfettered right to file a genuine and bona fide reporting of improprieties;
- accept reporting of any improprieties (actual or alleged) from employees and third parties;
- ensure that the complaint be investigated, and where appropriate, take action;
- guarantee that the whistleblower will be protected from any adverse consequences for reporting improprieties;
- not tolerate nor condone any obstruction or reprisal against the whistleblower and take such disciplinary action as it deems appropriate against any employee found to have caused or attempted to cause any obstruction or reprisals to the whistleblower; and
- disseminate and publish its whistleblowing program publicly on its website for all employees and external stakeholders.



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1. INTRODUCTION

What is whistleblowing?

Employees are usually uniquely situated within Easy Microfinance and amongst the first to know when something is going wrong in the company. A culture of “turning a blind eye” to such problems usually means that the alarm will not be sounded and management will not have a chance to take necessary appropriate action before substantial damage results.

Equally, third party stakeholders who are affected by Easy Microfinance and its activities may come to know about improprieties by employees that, if timely corrective actions are not taken, can cause adverse consequences on reputation and financial situation of Easy Microfinance.

Whistleblowing can therefore be described as the reporting by employees or third parties to Easy Microfinance, any knowledge or credible suspicion of attempted or actual improprieties.

What is impropriety?

Impropriety involves any unlawful, illegal, unethical or otherwise improper behavior and can include, amongst others:

- i. An unlawful act, whether civil or criminal;
- ii. Breach of or failure to implement or comply with approved company policy;
- iii. An unlawful act, whether civil or criminal;
- iv. Utilizing funds of the company in an unauthorized manner;
- v. Not observing the applicable internal and financial control procedures and policies;
- vi. Questionable accounting or auditing practices;
- vii. Abuse of power or authority for any unauthorized or ulterior purpose;
- viii. Intentional provision of incorrect information to public bodies; and
- ix. Suppressing or attempting to suppress any information relating to the above.

What is the intention of the Grievance Recourse / Whistleblowing Policy?

The Policy aims to:

- i. Encourage employees and external stakeholders to feel confident about raising concerns and
- ii. to question and act upon such concerns;
- iii. Provide an outlet for employees and external stakeholders to raise their concerns and acquire
- iv. feedback on any action taken as a result;
- v. Reassure employees and external stakeholders that they will be protected from possible
- vi. reprisals or victimization provided that they raise their concerns in good faith and reasonably



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- vii. believe them to be true.

Who should make complaints?

Any employee or external stakeholder who makes a disclosure or raises a concern under this GRP

will be protected if the individual:

- i. Discloses the information in good faith;
- ii. Has reasonable grounds to believe it to be substantially true;
- iii. Does not act maliciously; and
- iv. Does not seek any personal or financial gain.

Who should you contact?

Complaints should be addressed to the Easy Microfinance Head Office:

- ▶ Contact the Easy Clients complaints helpline on 099-69701766
- ▶ or contact us via email through complaint@easy.com.mm
- ▶ or send a written letter by post to:

Easy Microfinance Head Office

Attention: ESG Officer

#853, Kyaw Thu 22 Street

9 Ward, South Okkalapa Township

Yangon

Information received will be treated with the utmost confidentiality.

Any whistle-blowing report involving the Managing Director or the ESG Officer should be reported directly to the following director of the Company: ylaye@deltacapital.com

Company response

All whistleblowing reports other than reports involving the Managing Director or the ESG Officer shall be received by the ESG Officer who will log all reports into a grievance register. The ESG Officer shall



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conduct an initial review of the report received and recommend the remedial, disciplinary or other action to be taken. Actions taken by Easy Microfinance will depend on the nature of the concern. All investigations, except those involving the Managing Director or the ESG Officer shall be reported to the Managing Director for his attention and further action if necessary. The matters raised may:

- i. be investigated internally;
- ii. be referred to external auditor;
- iii. be referred to appropriate law enforcement agencies; or
- iv. be investigated by an independent inquiry.

In the event that the whistle blowing report involves the Managing Director or the ESG Officer, the report shall be escalated by the Director of the Company to the Board of Directors for their attention and further action as necessary.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Some concerns may be resolved by agreed action without the need for investigation. If urgent action required, this will be taken before any investigation is conducted.

Easy Microfinance will take steps to minimize any difficulties, which the complainant may experience as a result of raising a concern. For instance, if a complainant is required to give evidence in a criminal or disciplinary proceeding, Easy Microfinance will arrange for them to receive advice on what to expect.

Easy Microfinance accepts that complainants need to be assured that the matter has been properly and adequately addressed. Therefore, subject to legal constraints, Easy Microfinance will use reasonable endeavors to inform the complainant of the outcome of any investigation.

What safeguards are there for complainants?

Easy Microfinance will not tolerate any harassment or victimization (including formal pressures) and will take appropriate action to protect those who raise a concern in good faith.

No action will be taken against anyone who makes an allegation in good faith, reasonably believing it to be true, even if the allegation is not subsequently confirmed by the investigation. Efforts will be made to ensure confidentiality as far as this is reasonably practical.

Can the concern be taken outside of Easy Microfinance?

This Policy is intended to provide an avenue within Easy Microfinance to raise concerns. If an employee or a third party takes any matter outside the company, he or she would ensure that no disclosure of confidential information takes place.



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Confidentiality and Anonymity

Easy Microfinance will respect the confidentiality of any complaint received by a complainant where the complainant requests such confidentiality. However, it must be appreciated that it will be easier to follow up on matters and to verify complaints if the complainant is prepared to give his or her name.

Anonymity will not allow Easy Microfinance to follow up with the complainant and this make any investigation more difficult or incomplete. If the situation arises where the concern is not able to be resolved satisfactorily without revealing the complainant's identity (for instance, because evidence needs to be presented in court), Easy Microfinance will discuss with the complainant on how best to proceed.

Malicious, Mischievous and False Allegation

Easy Microfinance is proud of its reputation of having high standards of integrity. It will therefore ensure that adequate resources are put into investigation any complaint that it receives. However, Easy Microfinance will regard the making of any frivolous, bad faith, malicious, mischievous or false allegations by any employee as a serious disciplinary offence that may result in disciplinary action, up to and including dismissal for cause.

Making a report

Information received will be treated with the utmost confidentiality and will be attended to by the ESG Officer. Any whistle-blowing report involving the Managing Director or the ESG Officer may be reported directly to the following director of the Company: ylaye@deltacapital.com

2. CONSISTENCY WITH LAWS AND REGULATIONS

The grievance recourse / whistleblowing procedures shall be read in conjunction with any laws, regulations, policies, procedures or guidelines that may from time to time be prescribe or issued on the receipt, retention and/or treatment of complaints regarding the subject matter of these procedures.

In the event that any of these procedures is inconsistent or in conflict with any such laws, regulations, rules, directives, or guidelines or any part thereof, any such laws, regulation, rules, directives or guidelines shall prevail to the extent of such inconsistency or conflict.



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3. COMPLAINT PROCEDURES

Submission of a complaint

- i. All Complaints, other than reports involving the Managing Director or the ESG Officer shall be addressed to the ESG Officer who shall be authorized to receive and act on all Complaints received by or on behalf of Easy Microfinance:

- ▶ Contact the Easy Clients complaints helpline on 099-69701766
- ▶ or contact us via email through complaint@easy.com.mm
- ▶ or send a written letter by post to:

Easy Microfinance Head Office

Attention: ESG Officer

#853, Kyaw Thu 22 Street

9 Ward, South Okkalapa Township

Yangon

- ii. Any whistle-blowing report involving the Managing Director or the ESG Officer should be reported directly to the following director of the Company: ylaye@deltacapital.com

Confidentiality of identity

Complainants are strongly encouraged to disclose their identity when lodging Complaints. The identity of complainants who have lodged Complaints shall be kept confidential save where:

- i. the identity of the complainant, in the opinion of ESG Officer, is material to any investigation;
- ii. it is required by law, or by the order or direction of a court of law, regulatory body or such other body that has the jurisdiction and authority to require such identity to be revealed;
- iii. the ESG Officer thinks that it would be in the best interests of Easy Microfinance to disclose the identity;
- iv. it is determined that the Complaint was frivolous, in bad faith, or in abuse of these policies and procedures or lodged with malicious or mischievous intent; or
- v. the identity of such complainant is already public knowledge by reason other than disclosure under this paragraph.



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Registration of Complaints

A register to record detail of all Complaints lodged (“Grievance Register”) shall be maintained for the purposes of recording details of all Complaints received, including the date of such Complaint and the nature of such Complaint.

The Complaints Register shall be made available for inspection upon any request of the Board of Directors of the Company.

4. INVESTIGATION PROCEDURES

Review and investigation of Complaints

All whistle-blowing reports, other than reports involving the Managing Director or the ESG Officer shall be received by the ESG Officer who will log all reports into the grievance register. The ESG Officer shall conduct an initial review of the report received and recommend the remedial, disciplinary or other action to be taken by Easy Microfinance. All investigations shall be reported to the Managing Director for his attention and further action as necessary.

In the event that the whistle-blowing reports involves the Managing Director or the ESG Officer, the reports shall be escalated to the Board of Directors of the Company, for their attention and further action as necessary.

Determination by the Designated Responsible Person

Upon receipt of any Complaint, ESG Officer or Board of Directors may:

- i. conduct its own investigation or review;
- ii. instruct the internal auditors or external auditors other professionals to conduct further investigations or review;
- iii. instruct management to take such remedial, disciplinary or other action as it deems appropriate;
- iv. engage such third parties as deemed necessary, to commence or conduct further investigations or review;
- v. engage such third parties as deemed necessary to take such remedial, disciplinary or other action as it deems appropriate; and/or
- vi. take any other action as deemed in the best interests of the Company.

Abuse of Policies and Procedures



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Easy Microfinance may, upon determination by the ESG Officer or the Board of Directors, take or cause to be taken such action as is appropriate against any complainant who has made a Complaint frivolously, in bad faith, in abuse of the policies and procedure herein or lodged with malicious or mischievous intent.