



مصرف الائتمان العراقي  
Credit Bank of Iraq

Credit Bank of Iraq  
Whistleblowing policy

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group / administration	Department of Compliance and Corporate Governance

### The purpose of this policy:

The reporting policy approved by the bank's board of directors guarantees all bank employees the freedom to express any concerns related to their work that would negatively affect their role or the role of the department/department in which they work, or cause serious consequences that harm them or the bank as a whole.

- Create secure channels of communication between the whistleblower and the concerned department to receive and process reports in the bank about any violations that have been committed, are being committed, or are about to be committed, in order to combat fraud, embezzlement, corruption cases, and illegal, immoral, or unprofessional behavior. This policy is a complement to the Bank's professional conduct policy and principles.
- Promoting a culture of openness, accountability and integrity within the bank.
- Encouraging all levels of the Bank, including the Board of Directors, members of its committees, employees, temporary employees, suppliers and other service providers, consultants, customers or any other stakeholders, to report any cases of non-compliance with laws or regulations or any inappropriate conduct, misconduct or abuse of power, whether or not such practices occurred, without fear of punishment or reprisal.
- Provide a central channel for reporting all suspicious incidents.
- Protecting individuals from retaliation for exposing and reporting illegal behavior.

### Reportable behavior:

Behavior to report or conceal any suspicion of corrupt, illegal or immoral behavior that may occur within the bank. It includes: (fraudulent behavior - corrupt behavior - adverse behavior - legal or regulatory non-compliance - questionable accounting or auditing practices - retaliation), (for more information, please refer to the reporting policy).

### Legal protection for those who report violations:

Any employee who makes a report of violations must act in good faith and has reasonable grounds to believe that such information that have been detected represent misconduct or behavior that must be reported. Allegations that are not supported by evidence will be taken seriously which has been proven to be false or has been intentionally provided with the application of disciplinary measures as required by the case.

### Confidentiality of violation reporter's information:

Reported cases are treated in the strictest confidence. . Accordingly, the Board of Directors and/or the authorized person(s) shall, to the extent permitted by law and regulatory regulations, deal confidentially with the details of all reporters and do their best to prevent their identities from being disclosed. However, the investigation process may require revealing the source of the

report. In the event that this information is necessary for the continuation of the investigation. However, disclosure of the reporter's identity should be on an as-needed basis only.

#### False claim and legitimate employment:

An employee who knowingly makes false allegations of misconduct or bad behavior to executive management or to the Board of Directors shall be subject to disciplinary action (including termination of employment, if necessary) in accordance with the provisions of applicable Iraqi Labor Law and the Bank's rules, policies and procedures.

#### Reporting anonymously:

This policy encourages all concerned to provide their names in their reports whenever possible and should individuals choose to report their concerns anonymously this will be respected and it should be noted that concerns expressed anonymously are much less robust and will only be considered in accordance with the discretion of the bank.

#### The role of the Credit Bank of Iraq employee:

The Credit Bank of Iraq urges its staff and other stakeholders to express their concerns as soon as possible, as this will make action easier. The bank also aims to encourage transparency, and to provide support and protection under this policy for anyone who reports in good faith about real concerns of the occurrence of violations. breaches of institutional rules, regulations and policies; Retaliation against any individual or party for raising concerns about wrongdoing, raising legitimate ethical questions, or reporting actual or suspected wrongdoing is strictly prohibited.

#### Procedure of the Credit Bank of Iraq employee:

Certain procedures are followed for whistleblowing as the Credit Bank of Iraq urges its employees and other stakeholders to express their concerns as soon as possible, as this will make the action easier. The bank also aims to encourage transparency, and violations of all kinds can be reported as follows:

##### **Option 1: Line manager or department head**

Employees usually have to raise their concerns with their executive management, who notifies one of the concerned officials in the bank. This can be done either face to face or in writing by filling out the reporting form (please refer to the policy to view the attachment) and then the matter is referred to the Secretary of the Board of Directors who will raise it directly to the Chairman of the Board.

##### **Option 2: Compliance Officer**

If the concern is related to the line manager or department head, the employee may raise the matter directly to the compliance officer.

If employees disclose the issue internally and are concerned about either responding or not responding, or feel unable to communicate the issue to anyone, they can contact the Compliance Officer to discuss the matter.

The Compliance Officer will submit the report to the Chairman of the Board of Directors through the Secretary of the Board.

**Option 3: Chairman of the Board**

If the employee's concerns should be raised to a non-executive level or it is considered that the matter may seriously endanger the bank's reputation, the employee can raise the matter and report it confidentially to the Board Secretary to be forwarded to the Chairman of the Board by filling out the reporting form.

**Reporting channels**

Violations of all kinds can be reported through the channels identified in the policy and procedures for reporting violations, i.e. violations can be reported directly to the Compliance Department through the following channels:

- Call the direct number designated for reporting violations:

+964 780 320 0021

Send an e-mail to the reports Section at the following address:

[compliance@creditbankofiraq.com.iq](mailto:compliance@creditbankofiraq.com.iq)