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Whistleblowing Guidelines – External Stakeholders

This document provides a set of guidelines in which Kontiki Finance Limited (KFL) will handle legitimate concerns, to be objectively investigated and addressed.

KFL will always endeavour to abide by the laws and regulations of Fiji. However, the KFL Board and Executives encourage open communication of any knowledge or opinion to the contrary.

Any external stakeholder (this includes shareholders, contractors, or suppliers of KFL) may submit a written report to the Senior Management team of KFL when they believe someone may be engaged in fraud, unethical behaviour or other unacceptable conduct. The Senior Management team comprises the Chief Executive Officer, the Chief Financial Officer and the Head of Products and Distribution.

Any concern may also be communicated to the Board Chairman directly or through the Company Secretary. Details as follows:

Board Chairman

E: <u>board.chairman@kontikifinance.com</u> P: 330 3400 or 830 3400 Company Secretary E: <u>company.secretary@kontikifinance.com</u> P: 330 3400 or 830 3400

If the Discloser prefers, the concern may be reported to any other Board members via phone call, email or inperson.

The Discloser must provide a signed written report, ('Whistleblower Reporting Form' page 2). The Discloser may request that his/her name be kept confidential to persons other than the receiver of the report. It will be at the discretion of the Board Chair on whether the name of the Discloser is released and to whom.

The Whistleblower Reporting Form will be investigated thoroughly and confidentially.

KFL will endeavour to protect a Discloser from victimisation. No discriminatory action will be taken against any person, who *in good faith*, reports a suspected wrongdoing or participates in any subsequent investigation. *In good faith* means the Discloser genuinely believes wrongdoing has occurred.

All information provided by a Discloser under this Policy shall be treated as confidential information and the identity of the Discloser shall also be kept confidential.

The receiver of the report must take every care not to discuss the matter with persons involved in the report. Such information may only be shared with another party on a strict 'need to know' basis where sharing is required for the proper conduct of the investigation or is required by law or regulatory authorities.

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Whistleblower Reporting Form

HEAD	DESCRIPTION
Name of Discloser:	
Address:	
Phone:	
Email:	
Who do you wich to report to?	Board Chairman
Who do you wish to report to?	E: board.chairman@kontikifinance.com
[Please mark with a cross ⊠]	P: 330 3400 or 830 3400
	F. 330 3400 01 830 3400
	Company Secretary
	E: company.secretary@kontikifinance.com
	P: 330 3400 or 830 3400
	Senior Management Name:
	Position:
	Board Member Name:
Issue:	
	[Blank A4 may be used if more space is required]
2 1 1 1 1 1 1	
Persons involved and their	
Position:	
Documentary Evidence:	Please list any documentary evidence attached to this report.
	rease list any documentary evidence attached to this report.

Signed: ______

Date: _____