

Whistleblower Policy

1. POLICY

PCAsia's directors, officers, employees, consultants, contractors and agents ("PCAsia associates") bear responsibility for maintaining the standards and rules of PCAsia's Code of Conduct in the exercise of their professional duties with and on behalf of the Centre. PCAsia associates shall report any good faith concerns about violations or suspected violations of PCAsia's Code of Conduct, policies, applicable laws or regulations, or any illegal, unethical or other improper acts or practices done in the exercise of work with or on behalf of the Centre to PCAsia's Deputy Director (DD), Director of Operations & Finance (DOF) or the Human Resources Manager (HRM). In case of concerns about the conduct of the DOF, HRM and/or the Capacity Development Director (CDD), concerns should be addressed to PCAsia's Executive Director (ED). In the case of concerns about the conduct of the ED, concerns should be addressed to the Board of Directors (BoD). Concerns should be reported promptly.

A PCAsia associate or external stakeholder involved with, contributing towards or benefiting from the work or activities of PCAsia may communicate concerns in person in a face-to-face meeting or may set them forth in writing and indicate if he or she wishes to discuss the matter with the HRM, DOP, CPD, DD or ED or the Board of Directors. Such concerns could include acts or practices done in the exercise of professional duties with and on behalf of PCAsia of employees, consultants or vendors that, for example, constitute fraud, might lead to incorrect financial reports, involve discrimination or harassment, or might violate contractual or other commitments to sponsors or partners.

The recipient of a report of a violation or suspected violation shall use his or her best efforts to treat the report, the investigation of the report and the identity of the person making the report as confidential, consistent with the recipient's

responsibility to investigate the report and correct any confirmed violation, in compliance with law and regulations, as applicable. It is the policy of PCAsia to comply with reporting and other requirements imposed by law and regulation with respect any violation or suspected violation.

If the alleged wrongdoing is confirmed, the individuals responsible for the wrongdoing will be subject to appropriate disciplinary action, including termination for cause.

1.1 Intent of Policy

PCAsia is committed to the highest possible standards of ethical and moral conduct in all its activities. PCAsia complies fully with all applicable laws and regulations and adopts and observes internal policies that support ethical behavior and apply to all PCAsia associates. PCAsia's internal controls and operating procedures are intended to detect and to prevent or deter improper activities. However, PCAsia recognizes that even the best control systems cannot provide absolute assurance of detection, prevention or deterrence.

When suspected legal or ethical violations occur, PCAsia has the responsibility to investigate and correct the violations. This Whistleblower Policy is intended to encourage PCAsia associates to report suspected improper activities done in the exercise of professional duties with and on behalf of PCAsia and to provide guidance on the procedures for making reports under this policy.

1.2 Scope of Policy

The policy contained herein shall apply to all PCAsia associates worldwide, including all employees whether full-time, part-time or temporary, all independent contractors, all officers and all Board members.

1.3 Confidentiality

If a PCASIA associate or external stakeholder wishes, concerns may be submitted on a

confidential basis and will be investigated to the extent possible. PCAsia will use its best efforts to protect a complainant's identity. It should be noted that appropriate investigation may not be possible unless the source of the information is identified. Serious allegations will require thorough investigation that makes it impossible for PCAsia to guarantee confidentiality in all cases.

1.4 Retaliation Prohibited

It is the policy of PCAsia that no employee, officer, director, consultant, contractor, agent of PCAsia or or external stakeholder who in good faith reports any action or suspected action taken by, within or otherwise involving PCAsia that is illegal, fraudulent or in violation of public policy or any policy of PCAsia (each a "violation") shall suffer intimidation, harassment, discrimination or other retaliation or, in the case of employees, adverse employment consequence. Any form of retaliation, including harassment, discrimination or other victimization, against an associate submitting a concern in good faith will not be tolerated. In Email: kolap.kham@pcasia.org

Human Resources Manager (HRM)
Phone: 012 602 308
Email: sorphhea.sou@pcasia.org

Executive Director (ED)
Phone: 012 800 012
Email: dararith@pcasia.org

addition, no PCAsia associate shall be adversely affected because he or she refuses to cooperate with, participate in, or conceal any violations of PCAsia's Code of Ethics or of applicable laws or regulations, or any illegal, unethical or other improper acts or practices. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing.

1.5 Malicious Allegations

Malicious, false or bad faith allegations from a PCAsia associate will result in disciplinary action.

1.6 Notification

A copy of this policy shall be distributed to all directors, officers and employees and be made available to all external stakeholders by anonymous download.

1.7 Reporting Contacts

Director of Operations & Finance (DOF)
Phone: 012 772 120

Chair of the Board of Directors (BoD)
Phone: 012 267 788
Email: oumsarith_sgsenate@yahoo.com