

INTERNAL LEGAL ACT OF
“ARMSWISSBANK” CLOSED JOINT-STOCK COMPANY

Act number and name	<i>№ 279, Procedure on the Protection of Whistleblowers and Witnesses</i>
Approving body	<i>Management</i>
Date and grounds for approval	<i>Decision N. 69-L as of 11.12.2024</i>
Effective date	<i>11.12.2024</i>
Revision regular number	<i>01</i>
Subdivision(s) applying it	<i>All structural subdivisions</i>
Reviewing subdivision(s)	<i>Law Department</i>
Publicity	<input checked="" type="checkbox"/> <i>published</i> <input type="checkbox"/> <i>limited</i> <input type="checkbox"/> <i>confidential</i>



I. Introduction

- 1.1 The “ARMSWISSBANK” CJSC acknowledges the critical role of Whistleblowers and Witnesses in exposing Prohibited Practices and other acts of Wrongdoing in order to enable the “ARMSWISSBANK” CJSC to effectively prevent, detect, and mitigate such malfeasance and to safeguard the resources entrusted to its care. Whistleblowers and Witnesses play important roles in contributing to the mission of the “ARMSWISSBANK” CJSC. In protecting Whistleblowers and Witnesses, the “ARMSWISSBANK” CJSC is safeguarding its own financial, operational, and reputational integrity, and ultimately its efforts to make a significant and ambitious contribution to the implementation of its mandate.
- 1.2 The Procedure on the Protection of Whistleblowers and Witnesses (“the Procedure”) is an expression of the “ARMSWISSBANK” CJSC’s zero-tolerance of fraud and corruption and is intended to provide clear avenues for exposing fraud and integrity violations. By so doing, it would facilitate the effective prevention and detection of such malfeasance. Furthermore, it would enable the “ARMSWISSBANK” CJSC to safeguard the resources entrusted to its care and ensure that those resources are deployed effectively and efficiently.

II. Purpose

- 2.1 The purpose of this Procedure is to empower anyone covered by its provisions to report suspicions of Wrongdoing in good faith and without fear of retaliation so that the “ARMSWISSBANK” CJSC can effectively protect its interests, resources, and mission by detecting and mitigating financial and reputational risks as early as possible.

III. Definitions

- 3.1 For the purposes of this Procedure, the following terms are defined as follows:
 - a) **Directorate** means Directorate of the “ARMSWISSBANK” CJSC;
 - b) **Conflict of Interest** is any situation in which a party or any of its staff involved in the relevant decision-making process has interests that could, or could be perceived to, improperly influence the performance of official duties or responsibilities, contractual obligations, or compliance with applicable laws and regulations;
 - c) **Executing Entity and Subcontractor** is any party that contributes to, executes, implements, bids for, or in any way participates in, “ARMSWISSBANK” CJSC-related Activities, including receiving a grant (through sub-granting) or other form of financing or support from the “ARMSWISSBANK” CJSC;
 - d) **Covered Individuals** means individuals working at any level or grade within the “ARMSWISSBANK” CJSC, including (but not limited to) the Director,

management and staff of the “ARMSWISSBANK” CJSC, and other individuals contracted by the “ARMSWISSBANK” CJSC.

- e) **Evidence** means any physical object, record, document in any form, testimony, or other information that tends to establish the existence or non-existence of an allegation or fact;
- f) **External Party** means any person or entity other than a Covered Individual who contributes to, engages in, or is affected by or concerned with any “ARMSWISSBANK” CJSC-related Activity. An External Party may be an individual or an entity, and may include Executing Entities and Subcontractors;
- g) **External Whistleblowers and Witnesses** are External Parties who are Whistleblowers or Witnesses, as defined in this Procedure;
- h) **False or Malicious Report** means an inaccurate or misleading report that is made recklessly, or knowingly or deliberately for the purpose of gaining undue advantage or causing harm to a person or entity;
- i) **Bank-related Activity** means any activity which is financed, administered, or supported by the “ARMSWISSBANK” CJSC, either with its own resources or those of others, or any activity that materially affects or may affect or otherwise be relevant to the “ARMSWISSBANK” CJSC;
- j) **Bank Personnel** means any “ARMSWISSBANK” CJSC’s Staff and any other individual contracted and/or engaged by the “ARMSWISSBANK” CJSC to perform official functions for the “ARMSWISSBANK” CJSC;
- k) **Human Resources Legal Framework** means all policies, instructions, procedures, and guidance governing or instructing the conduct of “ARMSWISSBANK” CJSC’s Staff;
- l) **Prohibited Practices** are specific conduct as defined in the relevant “ARMSWISSBANK” CJSC’s principles and policies. Prohibited Practices include Corrupt Practice, Fraudulent Practice, Coercive Practice, Collusive Practice, Obstructive Practice, Abuse, Retaliation against Whistleblowers or Witnesses, Money Laundering, and Terrorist Financing;
- m) **Retaliation against Whistleblowers or Witnesses** means any detrimental act, direct or indirect, recommended, threatened, or taken against a Whistleblower or Witness, or person associated with a Whistleblower or Witness, because of his or her report of suspected Wrongdoing or cooperation with a “ARMSWISSBANK” CJSC investigation by the Whistleblower or Witness;
- n) **Subject of an Investigation** means a person who is suspected to have condoned, encouraged, participated, or engaged in a Wrongdoing that the Compliance is investigating either directly or by proxy;
- o) **Staff** means all persons appointed to a post in “ARMSWISSBANK” CJSC under a letter of appointment (individually, a “Staff Member”);
- p) **Whistleblower** is any person or entity, who, in good faith and on reasonable grounds, reports, attempts to report, is believed to be about to report, or is believed to have reported suspected Wrongdoing (including concerns of suspected Wrongdoing);

- q) **Wrongdoing** means conduct that violates “ARMSWISSBANK” CJSC’s policies or which involves significant risk to the “ARMSWISSBANK” CJSC because it is harmful to its interests, reputation, operations, or governance. Wrongdoing includes but is not limited to Misconduct, Prohibited Practices, and Conflicts of Interest; and
- r) **Witness** means any person or entity who cooperates in good faith, or is believed to be about to cooperate, or is believed to have cooperated with an investigation and provided information or evidence
- s) **Compliance** - refers to the organizational and operational structure under Risk Management and Compliance Department of the Bank, which is responsible for ensuring that the organization adheres to applicable laws, regulations, standards, and internal policies. Its primary role is to identify, assess, and mitigate compliance risks to safeguard the organization's integrity, reputation, and operational continuity.

IV. Scope and Applicability

- 4.1 This Procedure applies to Whistleblowers and Witnesses who report suspected Wrongdoing as defined by this Procedure. Reports of suspected Wrongdoing concerning matters within the competence of the Compliance shall be handled by the Compliance. Other reports, complaints, or grievances falling outside this scope shall be referred to or handled directly by the appropriate Units of the “ARMSWISSBANK” CJSC or other authorities lawfully exercising jurisdiction. Complex reports involving multiple concerns may be handled by more than one “ARMSWISSBANK” CJSC’s Unit or authority.
- 4.2 Whistleblowers or Witnesses may include persons who bring allegations and information in a grievance, complaint, or reconsideration request to the Compliance which amount to suspected Wrongdoing.
- 4.3 Any person or entity who makes a False or Malicious Report, is not protected by this Procedure and may be subject to sanctions or disciplinary action in accordance with relevant “ARMSWISSBANK” CJSC’s policies and guidelines, and the provisions of any contractual agreements existing between the “ARMSWISSBANK” CJSC and the person or entity.

V. General Principles

- 5.1 The “ARMSWISSBANK” CJSC shall not tolerate Retaliation against Whistleblowers and Witnesses. Retaliation against Whistleblowers and Witnesses is a Prohibited Practice.
- 5.2 Any person may report without encumbrance to the Compliance any allegations of suspected Wrongdoing that come to their attention and cooperate with the Compliance in the context of an investigation, proactive integrity review or other inquiry without fear of retaliation.
- 5.3 The “ARMSWISSBANK” CJSC including the Compliance shall take all available measures within the capacities of the Bank to protect Whistleblowers and Witnesses who have made a report or cooperated with an investigation in good faith and with reasonable belief that the report, information, or evidence provided is true.
- 5.4 Any person may anonymously report suspected Wrongdoing or provide evidence or information with regard to an investigation.
- 5.5 Subject to paragraphs 9.4 and 9.5, the “ARMSWISSBANK” CJSC shall keep confidential the identities of Whistleblowers and Witnesses, and their close family members and associates (if they so request). Such turns out to be not well-founded,

misguided, or incorrect, or that the report or information does not lead to a final determination by the “ARMSWISSBANK” CJSC that a Wrongdoing has occurred.

- 5.6 The “ARMSWISSBANK” CJSC shall take reasonable measures within the capacities of the “ARMSWISSBANK” CJSC to ensure that the basic rights of any person implicated by a report of Wrongdoing are respected.
- 5.7 Reporting suspected Wrongdoing in no way protects a Whistleblower or Witness from sanctions arising from their own Wrongdoing. In other words, blowing the whistle is no “escape hatch” for complicity in Wrongdoing. However, depending on the circumstances, their reporting and degree of cooperation shall be taken into consideration in determining the appropriate sanction or other remedy.
- 5.8 All Covered Individuals have a duty to refuse to participate in any Wrongdoing

VI. Reporting and Investigation of Suspected Wrongdoing

- 6.1 Any person or entity may report to the Compliance allegations of suspected Wrongdoing as defined by this Procedure. Persons with information concerning suspected Wrongdoing, particularly when it involves Covered Individuals and Executing Entities and Subcontractors in “ARMSWISSBANK” CJSC-related Activities, are strongly encouraged to report such information to the Compliance.
- 6.2 Subject to protections available, Covered Individuals have a duty to report suspected Wrongdoing as soon as possible after becoming aware of the suspected Wrongdoing in relation to any “ARMSWISSBANK” CJSC-related Activity. No approval, authorizations or clearance shall be necessary for “ARMSWISSBANK” CJSC’s Personnel to report suspected Wrongdoing.
- 6.3 Subject to protections available, any supervisor, manager or other such person of the “ARMSWISSBANK” CJSC who receives a report of suspected Wrongdoing which is made in good faith, is obligated to transmit such report without delay to the Compliance.
- 6.4 In accordance with the Procedure on Prohibited Practices of the “ARMSWISSBANK” CJSC and any succeeding Procedure pertaining thereto, Executing Entities and Subcontractors are obligated to promptly inform the “ARMSWISSBANK” CJSC of reports of suspected Prohibited Practices found or alleged in connection with a “ARMSWISSBANK” CJSC-related Activity; to investigate reports of suspected Prohibited Practices; and to report preliminary and final findings of such investigations to the “ARMSWISSBANK” CJSC. This obligation is subject to the terms and conditions of any prevailing legal agreements with the “ARMSWISSBANK” CJSC.
- 6.5 Except in the situations described in paragraphs 6.6 below, reports and information referred to in paragraphs 6.1 – 6.4 above, shall be sent to the Compliance through any of the following points of contact on the proviso that any changes regarding the contact details shall be communicated and disseminated appropriately:

Email: integrity@armswissbank.am

Hotline: + 374 60757 000

Mailing Address: 10 Vazgen Sargsyan street, 0010, Yerevan, RA

- 6.6 Where a report of suspected Wrongdoing is made against “ARMSWISSBANK” CJSC’s Personnel or their immediate family members, such report shall be made to the Head of Compliance. Reports of suspected Wrongdoing made against a “ARMSWISSBANK” CJSC’s Personnel working under the authority of the Head of the Compliance may be made to the Head of the Compliance.
- 6.7 Persons or entities reporting suspected Wrongdoing shall do so in good faith and provide where possible any information or evidence in their possession that would support a reasonable belief that Wrongdoing may have occurred. Prior to making a report, such persons or entities are not required to evaluate or to determine whether a report that they intend to make meets any threshold of seriousness or gravity. Reporting persons or entities are not required to prove the suspected Wrongdoing or to meet any evidentiary requirements.
- 6.8 In order to assist the successful conduct of investigations, reports should be as specific as possible. To the extent possible, they should include such details as:
- a) The type of suspected Wrongdoing;
 - b) When, where, and how the suspected Wrongdoing occurred; and
 - c) Who was involved and may have knowledge of the matters being reported.
- 6.9 Relevant documents or other evidence should be included with the report or provided as soon as possible. However, the absence of any of the details above should not prevent reporting, nor shall it prevent the Compliance or any other authority competent for the investigation from investigating reports of suspected Wrongdoing.
- 6.10 Protections provided in Section IX below shall apply to persons providing information regarding suspected Wrongdoing. A system to receive and respond to anonymous reports will be available to facilitate anonymous reporting.
- 6.11 Persons who intend to report suspected Wrongdoing and who are uncertain about the rules regarding reporting, or regarding any matter covered by this Procedure, may seek confidential advice from the Compliance. Covered Individuals may also seek advice on specific cases from the Compliance regarding the interpretation or application of this Procedure.
- 6.12 Reports of suspected Wrongdoing shall be handled in accordance with the relevant “ARMSWISSBANK” CJSC’s policies and standards. The Compliance treats seriously and thoroughly investigates reports of suspected Wrongdoing in a manner that is independent and objective by conducting administrative fact-finding investigations, free of control or influence by any person or entity, and with scrupulous adherence to the principles of fairness and due process.
- 6.13 In instances where reports of suspected Wrongdoing are determined not to fall under the authority of the Compliance, the Compliance may refer the person reporting to another body within or external to the “ARMSWISSBANK” CJSC as appropriate.

VII. Reporting and Investigation of Retaliation

- 7.1 Any Whistleblower or Witness who believes that he or she may suffer or has suffered from retaliation as a consequence of reporting a suspected Wrongdoing or for cooperating with an Compliance investigation should report this concern to the Compliance through the channels provided in paragraph 6.5.

- 7.2 Reporting and investigation of Retaliation follows the same rules and procedures as provided in Section VI of this Procedure.
- 7.3 Where, in the context of a challenge to an act or decision of the “ARMSWISSBANK” CJSC, a Whistleblower or Witness who is “ARMSWISSBANK” CJSC’s Personnel has made a prima facie case of retaliation by demonstrating that he or she has reasonable belief that his or her report of suspected Wrongdoing or cooperation with an investigation into Wrongdoing, is or was a contributing factor in the taking of the challenged detrimental action or decision by the “ARMSWISSBANK” CJSC, the burden of proof shall shift to the “ARMSWISSBANK” CJSC to show, by clear and convincing evidence, that the same action would have been taken or threatened in the absence of the report or cooperation.
- 7.4 When assessing whether a Covered Individual or Executing Entity or Subcontractor has engaged in Retaliation against a Whistleblower or a Witness, the Compliance or any other authority competent for the relevant investigation shall assess whether:
- a) the Whistleblower or Witness has made a prima facie case of retaliation by demonstrating that he or she has reasonable belief that his or her report of suspected Wrongdoing, or cooperation with an investigation into Wrongdoing, is or was a contributing factor in the taking or threat of the challenged detrimental action by such Covered Individual or Executing Entity or Subcontractor; and
 - b) such Covered Individual or Executing Entity or Subcontractor has shown, by clear and convincing evidence, that the same action would have been taken or threatened in the absence of the report or cooperation.

VIII. Cooperation with Investigations

- 8.1 Subject to protections available, all Covered Individuals have a duty to cooperate (such as by providing information, evidence, or testimony) as Witnesses in investigations of suspected Wrongdoing. For “ARMSWISSBANK” CJSC Personnel this duty is not subject to the authorization of or clearance by any Supervisor or other person, Unit of the “ARMSWISSBANK” CJSC, and failure to cooperate may result in disciplinary measures as provided in the relevant “ARMSWISSBANK” CJSC’s policies and guidelines.
- 8.2 In accordance with the relevant “ARMSWISSBANK” CJSC’s principles and policies, Executing Entities and Subcontractors are obligated to cooperate fully with the “ARMSWISSBANK” CJSC in any “ARMSWISSBANK” CJSC investigation into reports of suspected Prohibited Practices related to a “ARMSWISSBANK” CJSC-related Activity, and take all appropriate measures to ensure the full cooperation of relevant persons and entities subject to such investigation, including, in each case, allowing the “ARMSWISSBANK” CJSC to meet with relevant persons and to inspect all of their relevant accounts, records, and other documents and have them audited by or on behalf of the “ARMSWISSBANK” CJSC.
- 8.3 The Compliance may request other persons who are not Covered Individuals or Executing Entities of Subcontractors to cooperate as Witnesses in investigations.
- 8.4 All Witnesses to Compliance investigations shall cooperate in good faith and provide information or evidence which they believe to be true.

IX. Protection and Remedies for Whistleblowers and Witnesses

Anonymity and Confidentiality

- 9.1 Any person may submit a report of suspected Wrongdoing anonymously. Whistleblowers or Witnesses may request confidentiality regarding their identity, the identity of their close family member(s) or associate(s), and specific information conveyed at, during, or after an investigation. The Compliance will honor confidentiality requests to the extent possible within the legitimate needs of investigation.
- 9.2 In adherence to “ARMSWISSBANK” CJSC’s policies and procedures, the Compliance will protect the identities of and confidential information provided by Whistleblowers and Witnesses from unauthorized disclosure before, during, and after an investigation as far as possible using all available means, including physical, electronic, and procedural controls.
- 9.3 The Compliance will, during an investigation, take appropriate measures to protect the confidentiality of any non-public information associated with an investigation, and will take appropriate measures to prevent the unauthorized disclosure of investigative findings. Under certain circumstances, the Compliance may also keep confidential the identities of investigators involved in an investigation.
- 9.4 In cases where the disclosure of confidential information referred to in paragraphs 9.2 and 9.3 may be legitimately necessary to pursue an investigation, the Compliance shall secure the explicit consent of Whistleblowers, Witnesses, and any other party to an investigation to whom confidentiality has been granted.
- 9.5 In exceptional circumstances the “ARMSWISSBANK” CJSC may disclose information referred to in paragraphs 9.2 and 9.3 when such disclosure is required of the “ARMSWISSBANK” CJSC in judicial proceedings or to meet other legal obligations such as those imposed by law enforcement authorities, or when the “ARMSWISSBANK” CJSC pursues sanctions or disciplinary actions in response to a report which has been determined as being false and malicious. In such eventualities, the “ARMSWISSBANK” CJSC shall inform the Whistleblower, Witness, or any other party protected under paragraphs 9.2 and 9.3 about the need for disclosure, within a reasonable timeframe prior to the disclosure.
- 9.6 The Compliance will have sole access to investigation files and records, and the authority to determine whether such files and records, unedited or redacted, may be disclosed to individuals other than Compliance personnel on a need-to-know basis and subject to their obligation to keep confidentiality. Authorized staff of Compliance who have a conflict of interest in relation to, or who have recused themselves from, an investigation shall not be privy to any information on such investigation.
- 9.7 Compliance staff involved in an investigation in any capacity are required to preserve and protect the confidentiality of information related to investigations, including the identity of the subjects of investigation, Witnesses, or other parties concerned.
- 9.8 Whistleblowers shall be informed of the outcome of the review or investigation by Compliance into the matter, including whether suspected Wrongdoing has been substantiated and whether disciplinary measures, sanctions, or other measures

have been taken. The extent of such information to be informed shall be subject to the rules of the Information Disclosure Procedure of the “ARMSWISSBANK” CJSC.

Protections and Remedies for Covered Individuals

- 9.9 Whistleblowers and Witnesses who are Covered Individuals will be accorded, at their request, interim protection without delay, before, during the course of and pursuant to a review or investigation as necessary to safeguard their safety and well-being, in accordance with the Human Resources Legal Framework or any other “ARMSWISSBANK” CJSC’s Policy and procedures.
- 9.10 Where there is reasonable concern that a Covered Individual who is deemed to be a Whistleblower or Witness, or his or her close family member(s) or associate(s), may suffer, or are suffering, from retaliation (in connection with his or her report of suspected Wrongdoing) which may involve threatened or actual harm to personal security and well-being, the Compliance shall recommend to the “ARMSWISSBANK” CJSC’s Director to take protective measures as appropriate to ensure the personal safety and well-being of that Covered Individual, his or her close family member(s) or associate(s).
- 9.11 Where Retaliation against a Whistleblower or Witness who is a Covered Individual has been substantiated through investigation, the Covered Individual may request, and the Compliance may recommend, that the “ARMSWISSBANK” CJSC implement remedies. The Compliance will consult with the Director, with regard to the practicability, proportionality, and compliance with administrative law of remedies which the Compliance may recommend. Remedies include rescission or cessation of the retaliatory action and, if relevant, reinstatement to a post or reissuance of contract, and that the “ARMSWISSBANK” CJSC pay compensation in an amount reasonably necessary to compensate the said Whistleblower or Witness for the actual damages suffered. The Director or the Head of the Compliance, as appropriate, shall determine and require the “ARMSWISSBANK” CJSC to execute the remedy. In the event the Director intends to depart from Compliance’s recommendations because he or she finds for good cause that such a remedy would not be practicable or in the interest of “ARMSWISSBANK” CJSC, he or she shall propose alternative remedies.
- 9.12 The “ARMSWISSBANK” CJSC shall ensure that the protection or protective measures which are determined in accordance with Paragraphs 9.9 and 9.10 and the remedies determined pursuant to Paragraph 9.11 are implemented without delay.

Protections and Remedies for External Whistleblowers and Witnesses

- 9.13 External Whistleblowers and Witnesses are entitled to the protection provided in Section 9.
- 9.14 The “ARMSWISSBANK” CJSC shall endeavor to ensure that external Whistleblowers and Witnesses are protected from Retaliation by Covered Individuals. Covered Individuals who are found to retaliate against External Whistleblowers and Witnesses shall be subject to corrective or disciplinary measures or sanctions, as applicable, in accordance with “ARMSWISSBANK” CJSC’s policies and guidelines. An Executing Entity or Subcontractors who is found to have directly or indirectly condoned, encouraged, participated, or engaged in Retaliation against

Whistleblowers or Witnesses may be subject to sanctions in accordance with relevant "ARMSWISSBANK" CJSC's policies and subject to any legal agreements which may be concluded between the "ARMSWISSBANK" CJSC and the Executing Entity or Subcontractor.

- 9.15 Where an External Whistleblower or Witness, his or her close family member(s) or associate(s) may or does suffer Retaliation because of a report of suspected Wrongdoing or cooperation with an Compliance investigation, the "ARMSWISSBANK" CJSC shall endeavor to apply its good offices with appropriate authorities to secure necessary protection and to employ other reasonable measures to reduce the risks of retaliation.
- 9.16 Where Retaliation against an External Whistleblower or Witness by a Covered Individual or a Executing Entity or Subcontractor has been substantiated through a investigation, and corrective or disciplinary measures have been imposed against a Covered Individual in accordance with paragraph 9.14, or sanctions have been imposed against a Executing Entity of Subcontractor, the Compliance may recommend that the "ARMSWISSBANK" CJSC or the Executing Entity or Subcontractor take appropriate remedies for the benefit of such External Whistleblower or Witness. The "ARMSWISSBANK" CJSC shall ensure that such remedies are implemented without delay.

X. External Reporting

- 10.1 Protections against Retaliation shall be extended to a Covered Individual who reports suspected Wrongdoing to an entity outside of the established internal mechanisms where that person can show that:
- a) Such reporting is necessary so as to avoid:
 - i. A significant threat to public health and safety;
 - ii. Substantive damage to "ARMSWISSBANK" CJSC's operations; or
 - iii. Violations of national or international law;
 - b) The established internal mechanisms are inadequate because:
 - i. The Covered Individual has reasonable grounds to believe that it is not possible to report the suspected Wrongdoing through the established internal mechanisms because all such avenues would subject the Covered Individual to Retaliation within the "ARMSWISSBANK" CJSC;
 - ii. The Covered Individual has reasonable grounds to believe that it is not possible to report the suspected Wrongdoing through the established internal mechanisms because all such avenues would create a likelihood that evidence relating to the suspected Wrongdoing will be concealed or destroyed; or
 - iii. The Covered Individual has previously reported the suspected Wrongdoing through the established internal mechanisms (and not on an anonymous basis), and was not informed in writing of the status of the matter within six months of such report; and

- c) The Covered Individual does not accept payment or any other benefit from any party for such report.

10.2 External reports made in accordance with paragraph 10.1 of this Procedure and consistent with any confidentiality obligations to concerned third parties will not be considered as a breach of obligations relating to disclosure of information as provided for in “ARMSWISSBANK” CJSC’s policies and guidelines.

XI. Procedural Safeguards

11.1 The procedural safeguards for any Whistleblower, Witness, or Subject of an investigation shall be ensured throughout an investigation in accordance with international best practices as elaborated in the investigative standards and procedures of the Compliance. Procedural safeguards shall include that:

- a) Any person or entity implicated by a report of suspected Wrongdoing must be notified within a reasonable time of the report made against them, provided that this notification does not impede the progress of the procedure for investigating the suspected Wrongdoing; and
- b) In keeping with the principle of fair hearing, no findings shall be made in respect of an implicated person or entity unless that person or entity has had the opportunity to respond to the report of suspected Wrongdoing.

11.2 The procedures and procedural rights of “ARMSWISSBANK” CJSC’s Staff regarding the determination of disciplinary measures and any administrative review or appeal thereto shall be observed in accordance with the Human Resource Legal Framework.

XII. Communication, Capacity Building and Cooperation

12.1 The Compliance will proactively make known and communicate widely this and other integrity policies and procedures of the “ARMSWISSBANK” CJSC to Covered Individuals, Executing Entities or Subcontractors, and other stakeholders through all available means and as far as possible. It shall ensure that channels for reporting suspected Wrongdoing are easily accessible and available.

12.2 To further the effective implementation of this Procedure, the Compliance will conduct integrity training in coordination and cooperation with relevant Units of the “ARMSWISSBANK” CJSC, Executing Entities, Subcontractors, and other stakeholders. The Compliance will promote peer learning, engage in platforms for the sharing of best practices, give guidance that can be helpful in the implementation of “ARMSWISSBANK” CJSC-related activities, and explore developing a non-financial incentive-based approach to support good faith reporting of suspected Wrongdoing.

XIII. Procedure Compliance, Monitoring, Reporting and Review

13.1 The Compliance shall be responsible for the implementation of this Procedure. The Compliance shall collaborate with other Units to advise and ensure the effective implementation of the Procedure including that Executing Entities and Subcontractors have effective whistleblowing and witness protection policies and practices in place and that these

and other relevant obligations set out above are provided for in the contractual agreements between the “ARMSWISSBANK” CJSC and Executing Entity or Subcontractors.

- 13.2 The Compliance shall report on an annual basis to the Directorate. Before doing so, the Compliance shall communicate the report to the CEO for information, who shall have the possibility to provide comments for consideration by the Compliance and the Directorate.
- 13.3 The Compliance shall make regular public reports on its implementation of this Procedure. The Compliance shall maintain and publicly disclose a case registry of reports of suspected Wrongdoing, within the limitations of this Procedure, and in accordance with “ARMSWISSBANK” CJSC’s policies and standards regarding information disclosure.
- 13.4 The Compliance shall proactively monitor and review the implementation of this Procedure and the effectiveness of Whistleblower and Witness Protection in “ARMSWISSBANK” CJSC-related Activities following a risk-based approach. Such monitoring activities and reviews may involve public consultations.

XIV. Effective Date

- 14.1 This Procedure shall come into effect upon the approval of the Directorate of the “ARMSWISSBANK” CJSC.