

POLICY WHISTLEBLOWING

Purpose	This policy is aimed at protecting the integrity, transparency, impartiality and accountability throughout Company's operations. The whistleblowing policy provides a structured reporting channel and guidance to all employees and external parties to whistleblow without the fear of victimization or retaliation.
Scope	Applicable to all employees and all persons including contractors, business partners and visitors.

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1.0. Overview

- 1.1. The Company conducts business based on the principle of fairness, honesty, openness, decency, integrity and respect.
- 1.2. The Company's internal control and operating systems are intended to detect and prevent or deter improper or illegal activities. However, even the best system of control cannot provide an absolute safeguard against irregularities, improper or illegal activities.
- 1.3. In order to maintain a higher standard of ethical conduct, our organisation provides a broad way for employees to raise their concerns against any kind of fraud, scam, and misrepresentation of data in case they come across any of them without fear or unfair treatment.
- 1.4. The Company, therefore, has the responsibility to investigate and report to appropriate parties, the allegation of suspected improper or illegal activities and take appropriate actions.
- 1.5. Hence, employees and third parties are encouraged to use the guidance provided in this policy to report all allegations of suspected misconduct, irregularities or improper and illegal activities.

2.0. Exclusion

- 2.1. This policy does not include complaints relating to job performance, terms and conditions of employment unless there is an abuse of power by Company officials while discharging their duties pertaining to the items in this exclusion.

3.0. Definitions

3.1. Whistleblower

- 3.1.1. A person making a protected disclosure about improper or illegal activities is commonly referred to as a whistleblower.
- 3.1.2. The whistleblower may be an employee of the Company, applicant for employment, vendors, contractors, business partners, visitors, customers, government officials or the general public.
- 3.1.3. The whistleblower's role is as a reporting party. They are not, investigators or finders of facts, nor do they determine the appropriate corrective or remedial action that may be warranted.

3.2. Good faith

- 3.2.1. Good faith is evidence when a report is made without malice or consideration of personal benefit and the whistleblower has a reasonable basis to believe that the report is true, provided, however, a report does not have to be proven to be true to be made in good faith.
- 3.2.2. Good faith is lacking when the disclosure is known to be malicious or false.
- 3.2.3. In case the investigation team reaches a conclusion that the concern raised was false and was made with malicious intentions, in such case, disciplinary action is taken against the employee raising the concern. However, there may be cases when any concern is raised which might not need an investigation but it has been raised with honest intentions in such cases no action will be raised against the employee.

3.3. Misconduct/improper activity or act

- 3.3.1. Example of misconduct or improper activity or act includes, but are not limited to:
 - 3.3.1.1. Theft
 - 3.3.1.2. Corruption includes giving or receiving a bribe and giving or receiving personal advantages
 - 3.3.1.3. Breaches
 - 3.3.1.4. Fraud including financial fraud and accounting fraud
 - 3.3.1.5. Behaviour that is not in line with the Company's values
 - 3.3.1.6. Attempted acts of interference
 - 3.3.1.7. Retaliation, threats and reprisal
 - 3.3.1.8. Coercion or intimidation
 - 3.3.1.9. Violation of law and regulations
 - 3.3.1.10. Misuse of authority or company's powers
 - 3.3.1.11. Misrepresentation of the company's data
 - 3.3.1.12. Misrepresentation of financial records
 - 3.3.1.13. Any illegal act or unethical behaviour or practices
 - 3.3.1.14. Conflict of interest
 - 3.3.1.15. Sharing of confidential information
 - 3.3.1.16. Misuse of company assets
 - 3.3.1.17. Non-compliance with the company's authority
 - 3.3.1.18. Disclosing confidential information to outsiders (example competitors)
 - 3.3.1.19. Theft of confidential information's
 - 3.3.1.20. Endangerment to public health or safety
 - 3.3.1.21. Violation of Company's policies
 - 3.3.1.22. Negligence of duty alike
 - 3.3.1.23. Endangering the safety and wellbeing of employee(s)
 - 3.3.1.24. Or any act that is inconsistent with the laws of Malaysia

4.0. Making a report

- 4.1. The Company presumes that whistleblowers will act in good faith and will not make false accusations when reporting misconduct by the Company's employees.
- 4.2. Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company, the Company's customers, shareholders, employees, investors or the public at large.
- 4.3. Whistleblowers are encouraged to lodge the report timely and also to ensure there is a timely response from the company on the same.
- 4.4. Acts of misconduct may be disclosed in writing or in person telephonically. However, all reports are encouraged to be made in writing, so as to assure a clear understanding of the issues raised.
- 4.5. Although the whistleblower is not expected to prove the truth of an allegation, he/she needs to demonstrate to the person contacted that there are sufficient grounds for concern. Adequate information will assist greatly in the investigation.
- 4.6. Individuals are recommended to self-identify, though it is not a requirement.
- 4.7. Reports can be raised to:
 - 4.7.1. In person or via any written communication to any Company Officials such as Managing Director or Human Resources Department.
 - 4.7.2. Company hotline
 - 4.7.3. Or other means comfortable to the whistleblower but directed to the persons mentioned above.

5.0. Investigation Management

- 5.1. Any report received by the Company officials, or employees should be forwarded immediately to the Managing Director
- 5.2. The investigation team shall carry out an investigation in a very transparent way while maintaining confidentiality so as not to endanger the whistleblower.
- 5.3. The Company may or may not respond to the whistleblower and shall be done on a case-to-case basis subject to the nature of the complain raised.

6.0. Protection of Whistleblower

- 6.1. Consistent with the policies of the Company, the Company's Management will not retaliate or attempt to retaliate and will not tolerate any retaliation or attempted retaliation by any other person or group, directly or indirectly, against anyone who, in good faith, makes a report or provide assistance to the Company including any governmental, regularity or law enforcement body, investigating or otherwise helping to resolve a report.

7.0. Records

- 7.1. The Head of the Human Resources Department will retain on a strictly confidential basis for a period of seven (7) years all records relating to any report and the investigation to its resolution.
- 7.2. All such report is classified as privileged and confidential.

- 8.0. The Company reserves the right to amend this policy from time to time and shall notify all employees when such amendment has been made and has been approved by the Management.
- 9.0. Should there be a translation of this policy into other languages, the English version of this policy shall be authoritative in the event of any dispute or confusion.

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