

WHISTLEBLOWING PROTECTION POLICY AND STANDARD OPERATING PROCEDURE ON WHISTLEBLOWING MANAGEMENT

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PROCESS OWNER

1. SECTOR : CEO OFFICE
2. DIVISION/DEPARTMENT : INTEGRITY & GOVERNANCE DEPARTMENT
3. SECTION : N/A
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Document Disclaimer

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1.0 ABBREVIATION

ABBREVIATION	DESCRIPTIONS
ARMC	Audit & Risk Management Committee of KPRJ
CEO	Chief Executive Officer of KPRJ
IGD	Integrity & Governance Department of KPRJ
SOP	Standard Operating Procedure
LDAT	Limit Delegated of Authority Table
RO	Responsible Officer
KPRJ	Kumpulan Prasarana Rakyat Johor Sdn. Bhd. & its' Group of Companies
WPA 2010	Whistleblower Protection Act 2010

2.0. DEFINITION

“Audit and Risk Management Committee” means the Audit and Risk Management Committee (ARMC) of the Board of Directors of KPRJ;

“Business Associate” means an external party with whom KPRJ has, or plans to establish, some form of business relationship. This may include clients, customers, joint ventures, partners, consortium, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors.

“Controlled Organization” means an entity where KPRJ has the decision-making power over the organization such that it has the right to appoint and remove the management. This would normally be where KPRJ has the controlling interest (>50% of the voting share ownership), but it could be where KPRJ has the right to appoint the management and decision making.

“External Parties” refer broadly to, but not limited to, members of the public or those who are impacted by various organizational or business activities of KPRJ.

“Responsible Officer” refers to the Head of Integrity & Governance who is responsible for the investigation, handling and escalation of reportable concerns or a person or persons appointed by CEO or ARMC Chairman to handle the case in the event the case involved Integrity and Governance Department personnel.

“Whistle Blowing” refers to a voluntary disclosure of individual or organizational malpractice by a person who has privileged access to data, events, or information about an actual, suspected, or anticipated wrongdoing or malpractice within or by KPRJ that is within its ability to control. There are two categories of whistle blowers namely:

“Internal Whistle Blowers” refers to Directors and Employees who are expected to report incidents of misconduct involving peer, supervisor/superior or top management staff to relevant reporting point.

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“**External Whistle Blowers**” refers to business associates and external parties who report wrong doings to relevant reporting point.

“**IGD**” means Integrity and Governance Department of KPRJ.

“**KPRJ**” or “**Company**” means KPRJ Sdn. Bhd. and its group of companies;

3.0 INTRODUCTION

Kumpulan Prasarana Sdn. Bhd. and its subsidiaries (KPRJ) are committed to highest standard of integrity, openness and accountabilities in conduct of its business and operation. KPRJ aspires to conduct its affair in an ethical, responsible and transparent manner.

In embracing good corporate governance practices, KPRJ has put in place a **Whistleblowing Protection Policy** to promote high standards of ethical conduct and open communication whilst ensuring protection to the Whistleblowers.

KPRJ’s Whistleblowing Policy was first introduced in January 2020. This is an updated version and renamed Whistleblower Protection Policy.

4.0 OBJECTIVE

The Policy and Procedure aims to create a work environment where directors, employees, vendors, contractors, consultants, subcontractors, agent, service providers, customers and other stakeholders are able to raise concerns on misconduct, irregularities or malpractices, without fear of harassment and/or victimization and with an assurance that their concerns will be taken seriously and investigated.

It is intended to encourage staff and other relevant stakeholders to report unethical or illegal conduct.

Objective of this Manual are to:

- 4.1 Promote a culture of openness, accountability and integrity;
- 4.2 Encourage timely reporting of alleged malpractices or misconduct;
- 4.3 Provide a confidential channel for escalation of concerns without fear of reprisal;
- 4.4 To determine control and action to any bribery related complaints;
- 4.5 Provide guidance on whistleblowing management to all staff, controlled and non-controlled organizations and public;
- 4.6 Ensure consistent and timely response to reported improprieties and awareness by whistle blowers of their options or rights;
- 4.7 Ensure appropriate oversight by the Board of Directors;
- 4.8 Serve as a means of preventing and deterring misconduct that may be contemplated; and
- 4.9 Protect the rights of KPRJ.

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5.0 SCOPE

This policy is applicable to KPRJ, its controlled organizations, business associates acting on KPRJ's behalf, the Board of Directors, all KPRJ personnel and external parties that are members of the public or those who are impacted by various organizational or business activities of KPRJ.

Joint-venture companies or associated companies which KPRJ is non-controlling are encouraged to adopt these or similar principles. External Providers are also expected to comply with this policy in relation to all work conducted with KPRJ, and/or on KPRJ's behalf.

Reportable incidents for whistle blowing include, but limited to:

- 5.1 All forms of financial or non-financial malpractices or impropriety such as fraud, corruption, bribery, blackmail, sabotage or theft;
- 5.2 Harassment and abuse and misrepresentation of power and authority;
- 5.3 Criminal Offences;
- 5.4 Failure to comply with laws and regulations;
- 5.5 Actions detrimental to health and safety or the environment;
- 5.6 Discrimination on the basis of gender, race, disabilities;
- 5.7 Miscarriage of Justice;
- 5.8 Serious conflict of interest without disclosure;
- 5.9 Breach of KPRJ's policies or Code of Business Conduct and Work Ethics; and
- 5.10 Concealing information about any or combination of the above malpractice or misconduct.

6.0 REFERENCES

- 6.1 The Whistleblower Protection Act 2010
- 6.2 Companies Act 1965
- 6.3 Malaysian Anti-Corruption Commission Act 2009
- 6.4 Personal Data Protection Act 2010
- 6.5 Anti-Bribery Manual, Policy and Guiding Principles
- 6.6 Limit of Delegated Authority Table (LDAT)
- 6.7 KPRJ Grievance Handling and Disciplinary Procedure

7.0 LEGISLATION

The Whistleblower Protection Act 2010 (WPA 2010) is a law of Malaysia to combat corruption and other wrong doings by encouraging and facilitating disclosures of improper conduct in the public and private sector, to protect persons making those disclosures from detrimental action, to provide for the matter disclosed to be investigated and dealt with and to provide for the remedies connected therewith.

The Act was passed by Parliament in June 2010, and was brought into force on 15 December 2010. The objective of this act is to give protection to the whistle-blower in the form of confidentiality of their information, immunity from civil and criminal action and protection from detrimental action being taken against them.

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The Act covers any member of the public and private sectors who discloses wrongdoings. Among the disclosures that intended to be disclose are abuse of authority, violation of laws and ethical standards, danger to public health or safety, gross waste, illegality and mismanagement. The disclosure should be made in “good faith” based on “honest and reasonable grounds at the material time” without necessitating hard evidence from the whistle-blower.

Under the law, anyone engaging in retaliatory conduct against the whistleblowing employee will be subjected to enforcement action under Section 10 (6) of the WPA2010.

10 (6) Any person who contravenes subsection (1) commits an offence and shall, on conviction, be liable to a fine not exceeding one hundred thousand ringgit or to imprisonment for a term not exceeding fifteen years or to both.

(Source Section 10 (6) Whistleblower Protection Act 2010)

10. (1) No person shall take detrimental action against a whistleblower or any person related to or associated with the whistle-blower in reprisal for a disclosure of improper conduct.

(Source Section 10 (1) Whistleblower Protection Act 2010)

8.0 KPRJ WHISTLEBLOWER POLICY

8.1 WHISTBLOWER PROTECTION

8.1.1 The policy protects the whistle-blower who lodged a report or complaint, provided the report is made in good faith.

8.1.2 Any person that has made report in good faith is protected against adverse employment actions which will affect his or her livelihood (e.g. discharge, demotion, suspension, harassment or other forms of discrimination) for reporting improper conduct.

8.1.3 He or she is protected even if the report made proved to be incorrect or unsubstantiated.

8.2 REVOCATION OF WHISTLEBLOWER PROTECTION

The revocation of whistleblower protection can only be made in the event the conditions specified under Section 11 (1) of the WPA 2010 are met in the opinion of KPRJ namely:

8.2.1 The whistleblower himself has participated in the improper conduct disclosed.

8.2.2 The whistleblower wilfully made in his disclosure of improper conduct a material statement which he knew or believed to be false or did not believe to be true

8.2.3 The disclosure of improper conduct is frivolous or vexatious

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- 8.2.4 The disclosure of improper conduct principally involves questioning the merits of government policy, including policy of a public body
- 8.2.5 The disclosure on improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action
- 8.2.6 The whistleblower, in the course of making the disclosure or providing further information, commits an offence under the WPA2010.

8.3 ASSURANCE OF CONFIDENTIALITY

- 8.3.1 All reports and identity of the whistleblower will be treated in a confidential and sensitive manner. A report will only be disclosed to those who are authorised to carry out investigation into matters relating to the report. The identity of the whistleblower shall always be withheld in these circumstances.
- 8.3.2 If a whistle blower believes that he or she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he or she should immediately report those facts to KPRJ's Audit & Risk Management Committee (ARMC) Chairman. Reporting should be done promptly to facilitate investigation and the taking of appropriate action.

9.0 KPRJ WHISTLEBLOWING PROCEDURES**9.1 MAKING A REPORT**

Any person may report allegations of suspected misconduct or breach or suspected breach of law, rule or regulation under which the Company operates that may adversely affect the Company and its stakeholders.

- 9.1.1 Acts of misconduct or improper activities may be disclosed in writing, by e-mail, telephone or in person. However, all reports are encouraged to be made in writing so as to assure a clear understanding of the issues raised.
- 9.1.2 The whistleblower is encouraged to use the "**KPRJ's Whistleblowing Form**" attached in this manual (**Appendix 1**) and downloadable from www.kprj.com.my
- 9.1.3 The whistleblower needs to demonstrate that he or she has reasonable belief of the misconduct.
- 9.1.4 Whistleblowers are encouraged to lodge a report by providing, to the extent that is possible, the following information:
 - i. description of the misconduct and the people/party (ies) that are involved (to state whether they are employees of the Company or external parties);
 - ii. details of the misconduct, including the relevant dates of occurrence;
 - iii. particulars of witnesses, if any; and
 - iv. particulars or production of documentary evidence, if any.

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9.1.5 Although the Whistle-blower is not expected to prove the truth of an allegation, he or she needs to demonstrate to the person contacted that there are sufficient grounds for concern.

9.1.6 Any employee or member of the public who wishes to report improper conduct is encourage to disclose their identity to KPRJ in order for KPRJ to accord the necessary protection to them.

9.1.7 The concern or complaint can be disclosed to one of the following channels;

1. Email to kprj.whistleblower@gmail.com

It is a whistleblowing e-mail channel created to receive any report on allegations of suspected misconduct or breach or suspected breach of law, rule or regulation under which the Company operates that may adversely affect the Company and its stakeholders.

The e-mail is only assessable by Integrity and Governance Department of KPRJ.

2. KPRJ's Head of Integrity and Governance

Name : Mustapha Bin Hussein
E-mail : mustapha@kprj.com.my
Telephone : 016-3061015
Mail : Mark "**STRICTLY CONFIDENTIAL**"
Integrity & Governance Department
Kumpulan Prasarana Rakyat Johor Sdn. Bhd.
G-07 & 08, Blok 4, Danga Bay,
Jalan Skudai,
80200 Johor Bahru, Johor.
Attention: Head of Integrity & Governance, KPRJ

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3. KPRJ's Chief Executive Officer (CEO)

Name : Tuan Haji Lukman Bin Abu Jari @ Abu Bakar
Email : lukman@kprj.com.my
Telephone : 012-7267613
Mail : **Mark "STRICTLY CONFIDENTIAL"**
Chief Executive Officer Office
Kumpulan Prasarana Rakyat Johor Sdn. Bhd.
G-07 & 08, Blok 4, Danga Bay,
Jalan Skudai,
80200 Johor Bahru, Johor.
Attention: Chief Executive Officer, KPRJ

4. KPRJ's Audit and Risk Management Committee Chairman

Name : YB Dato' Salehuddin Bin Hassan
Email : salehuddin@johor.gov.my
Telephone : 012-7895051
Mail : **Mark "STRICTLY CONFIDENTIAL"**
Kumpulan Prasarana Rakyat Johor Sdn. Bhd.
G-07 & 08, Blok 4, Danga Bay,
Jalan Skudai,
80200 Johor Bahru, Johor.
Attention: Chairman,
Audit and Risk Management Committee, KPRJ

9.1.8 Good Faith vs. Mala Fide Report

Good faith is when a report is made without malice or consideration of personal benefit and the Whistle-blower has a reasonable basis to believe that the report is true. A report need not be proven true for a report to be made in good faith. Good faith is absent when a report is made maliciously or falsely (mala-fide).

If, however, an employee makes a mala fide report, disciplinary action may be taken against such employee.

On the other hand, if a Business Associate or External Party lodges a mala fide report, KPRJ may consider lodging a police report and/or take other necessary actions deemed appropriate.

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9.2 INVESTIGATION

- 9.2.1 Integrity & Governance Department (IGD) is the Responsible Officer authorised to conduct preliminary investigate and address all whistleblowing cases reported to them.
- 9.2.2 If required, he can obtain assistance from other resources within the Group (e.g. Human Resources Department, Legal Department, Other Department etc).
- 9.2.3 The Head of IGD will be responsible to monitor and report all cases investigated pursuant to this Whistle-blower Protection Policy to Chief Executive Officer (CEO) or Audit & Risk Management Committee (ARMC).
- 9.2.4 In the event a report is made on any IGD Officer, the complaint shall be handled by the CEO or ARMC Chairman or any person appointed by ARMC in order to prevent any conflicts of interest or biasness in the said investigation. In this case the person appointed shall be the Responsible Officer.
- 9.2.5 All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations.
- 9.2.6 Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.
- 9.2.7 Upon completion of investigation, appropriate course of action will be recommended to the CEO or ARMC for its deliberation. Decision taken by the CEO or ARMC will be implemented immediately. An investigation can be referred to the Board of Directors of the Company in the event the CEO or ARMC deems it necessary to do so.
- 9.2.8 KPRJ reserves the right to refer any concerns or complaints to appropriate external regulatory authorities.
- 9.2.9 Kindly refer clause 10.0 of this Manual on the reporting & investigation process flowchart.

9.3 INVESTIGATION REPORT

- 9.3.1 At the conclusion of the investigation, the Responsible Officer will submit an Investigation Report of the findings to the CEO or ARMC Chairman.
- 9.3.2 The Investigation Report shall contain but not limited to the following: -
- a) the specific allegation(s) of Improper Conduct;
 - b) all relevant information/evidence received and the grounds for accepting/rejecting them.
 - c) the conclusions made and the basis for them.

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9.3.3 Where practical, the Responsible Officer may include the followings in the report:

- i. the steps or recommendations that need to be taken by the Company to prevent the Improper Conduct from continuing or re-occurring in future; and
- ii. any further action to be taken by the Company in respect of the Improper Conduct. The further action includes initiating disciplinary proceedings, or referring the matter to the appropriate external authority.

9.3.4 In the event, it is decided that misconduct has been committed, the matter shall be referred to the Human Resource Department for disciplinary proceedings.

9.3.5 The matter may also be referred to Company's Legal Department for further advice.

9.4 NOTIFICATION

Non-anonymous whistleblower has a privilege to know the outcome of the reported case at the conclusion of the investigation, without divulging confidential information. However, the Company at its' discretion may decide not to disclose the outcome of the investigation if it is sensitive in nature.

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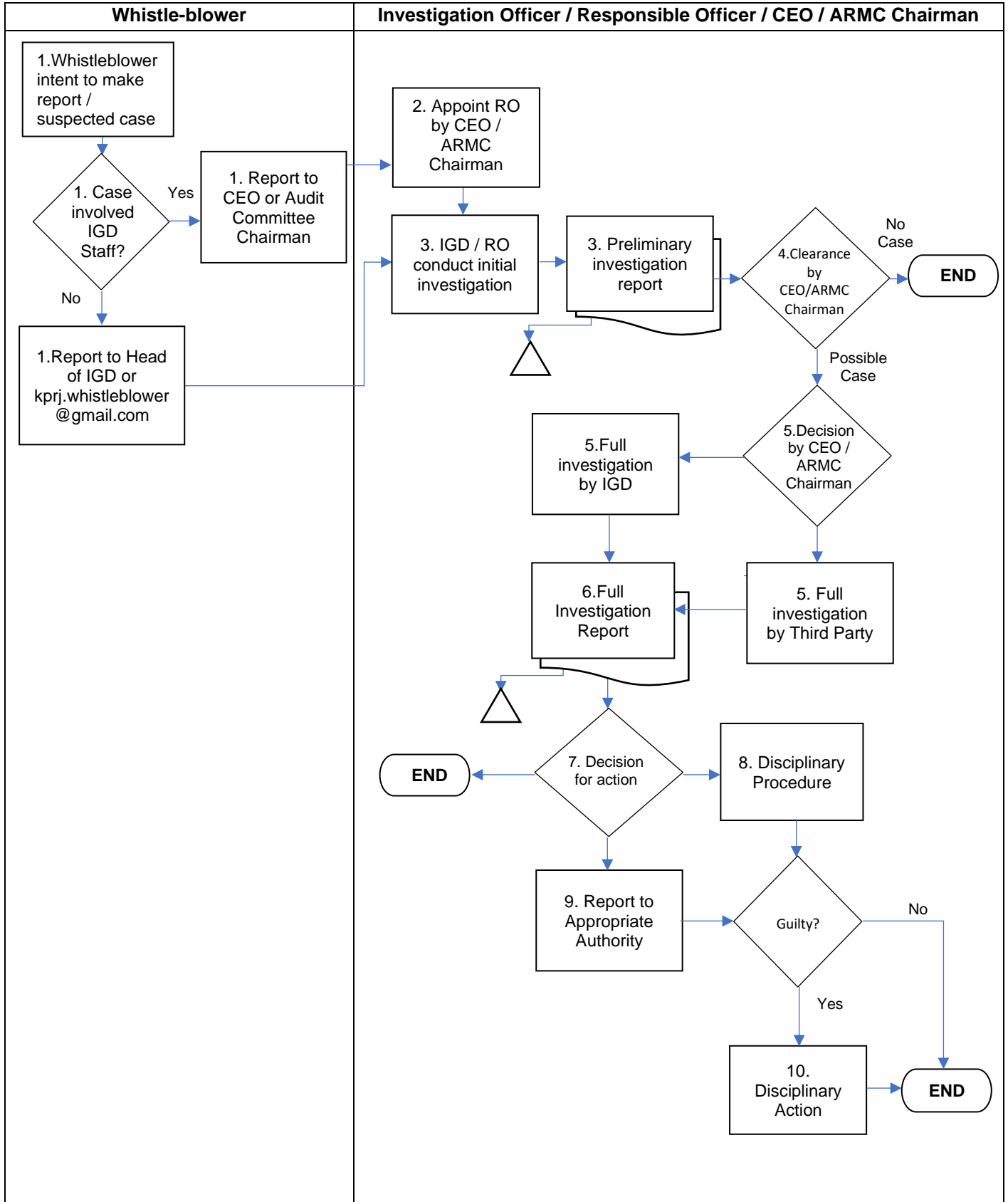
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10.0 PROCESS FLOW DIAGRAM


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11.0 PROCEDURE OUTLINES & DETAILS

NO.	TASK OUTINES	ROLE	DESCRIPTIONS	OUTPUT
1.	Whistle-blower intent to make report / suspected case	Whistle-blower	<ul style="list-style-type: none"> Whistle-blower may make report to any of the channel as described in the Whistleblowing Protection Policy. Any suspected case can also possibly be discovered during internal audit or compliance review If the case involved IGD staff, the report shall be made to CEO or ARMC Chairman as per Whistleblowing Protection Policy (ABMS-POLICY-002-00). If it does not involve IGD staff, the report shall be made to kprj.whistleblower@gmail.com, Head of IGD, CEO or ARMC Chairman. For report received by IGD, it will be recorded in the log book maintained by IGD. 	Whistle-blowing Form (Borang Salahlaku Integriti)
2.	Appoint RO by CEO / ARMC Chairman	CEO / ARMC Chairman	<ul style="list-style-type: none"> For any report made to Head of IGD, to CEO or ARMC Chairman (which are later channeled to Head of IGD), IGD is responsible to conduct initial investigation. However, if the case involved IGD staff, CEO or ARMC Chairman may appoint other officer as Responsible Officer to conduct preliminary investigation for the alleged misconduct. 	Decision by CEO or ARMC Chairman
3.	IGD / RO Conduct Initial investigation	IGD / Responsible Officer	<ul style="list-style-type: none"> The Responsible Officer either it is from IGD or other person appointed by CEO or ARMC Chairman shall conduct the investigation upon received of the case. IGD or the Responsible Officer shall sum-up the investigation in the initial investigation report. 	Preliminary Investigation Report
4.	Clearance by CEO or ARMC	CEO / ARMC Chairman	<ul style="list-style-type: none"> The Preliminary Investigation Report shall be presented to the CEO or ARMC Chairman depends on the case. CEO or ARMC Chairman shall make decision based on the report either to proceed further with full investigation or drop the case depends on the findings. 	Decision by CEO or ARMC Chairman
5.	Decision by CEO / ARMC Chairman	CEO / ARMC Chairman	<ul style="list-style-type: none"> On the full investigation, CEO or ARMC Chairman may decide whether; <ol style="list-style-type: none"> For IGD to conduct full investigation; or For Third Party i.e. Responsible Officer (example Private Investigator Services or Forensic Specialist) to conduct full investigation. 	Decision by CEO or ARMC Chairman
6.	Full investigation	IGD / Third-Party Investigation Officer	<ul style="list-style-type: none"> IGD or Responsible Officer shall investigate the matters and produce the full investigation report upon completion of the investigation. 	Full Investigation Report

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NO.	TASK OUTINES	ROLE	DESCRIPTIONS	OUTPUT
7.	Decision for action	Human Resource Department / Appropriate Authority	<ul style="list-style-type: none"> Upon receiving the full investigation report, CEO or ARMC Chairman shall decide on one of the following: <ol style="list-style-type: none"> refer the case to Human Resource Department (HRD) for Disciplinary Procedure as per “KPRJ Grievance Handling and Disciplinary Procedure”; to report to authority (example; PDRM or SPRM); or To stop the case, if there is no ground for further action. 	Disciplinary Procedure or Copy of report to appropriate authority
8.	Decision for Disciplinary Procedure	CEO / ARMC Chairman	<ul style="list-style-type: none"> If it is decided for HRD to conduct disciplinary procedure, HRD shall conduct the action as per “KPRJ Grievance Handling and Disciplinary Procedure”. If found guilty, the disciplinary action shall be taken against the guilty person. If not guilty, the case shall be closed. 	Decision by CEO or ARMC Chairman
9.	Decision to report to Appropriate Authority	CEO / ARMC Chairman	<ul style="list-style-type: none"> If it is decided to report to appropriate authority. A report shall be made to police or SPRM or other appropriate authority under the law. Upon receiving results of the investigation by the authority, if found guilty, Company shall take disciplinary action against the guilty person. If not guilty, the case shall be closed. 	Authority Investigation Results
10.	Disciplinary Action	Human Resource Department	<ul style="list-style-type: none"> Disciplinary action shall be taken in accordance with “KPRJ Grievance Handling and Disciplinary Procedure” may include <ol style="list-style-type: none"> Caution or verbal warning; Written warning; Suspension without pay; Deferment, withholding or stoppage of annual increment; Downgrading or demotion; Dismissal or discharge; or Any other punishment permitted by law. 	Disciplinary Action

11.1 ENTRY CRITERIA

- 11.1.1 Report on alleged misconduct
- 11.1.2 Whistleblower Form

11.2 EXIT CRITERIA

- 11.2.1 Preliminary Investigation Report
- 11.2.2 Final Investigation Report
- 11.2.3 Authority Investigation Results
- 11.2.4 Disciplinary Action

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11.3 RESPONSIBILITIES**11.3.1 Whistleblower**

- i. Report genuine case
- ii. Report to appropriate channel as described in the Manual
- iii. Keep confidential of the facts of suspected misconduct
- iv. Report made in good faith
- v. Discreet in providing information related to the case to Responsible Officer or Investigation Officer
- vi. Provide full cooperation during investigation

11.3.2 Integrity & Governance Department

- i. Received and document reports made by whistleblowers
- ii. Provide consultation to give assurance on whistleblower's safety
- iii. Conduct preliminary investigation upon instruction by CEO or ARMC Chairman
- iv. Conduct full investigation upon decision by CEO or ARMC Chairman
- v. Record all cases reported to IGD in the logbook
- vi. Maintain whistleblowing e-mail kprj.whistleblower@gmail.com
- vii. Ensure on confidentiality of the case on hand.

11.3.3 ARMC Chairman & CEO

- i. Received reports made by whistleblower
- ii. Appoint Responsible Officer to conduct preliminary investigation
- iii. Decide on the ouns of the case upon received preliminary investigation report
- iv. Appoint or / and instruct on full investigation
- v. Decide on Investigating Officer to conduct full investigation
- vi. Decide on whether to report case direct to Authorities.
- vii. Decide on further action and whether to conduct disciplinary proceeding upon received of full investigation report
- viii. Ensure confidentiality on the case

11.3.4 Human Resource Department

- i. Administer Disciplinary Proceeding according to Company Policy and Procedures.
- ii. Ensure confidentiality on the case

11.4 MEASUREMENT

- 11.4.1 Preliminary investigation shall be conducted on all reported cases.
- 11.4.2 All reported cases shall be referred to CEO or ARMC Chairman upon completion of preliminary investigation.
- 11.4.3 Conduct full investigation for cases that are decided for full investigation by CEO or ARMC Chairman.

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BAHAGIAN C – TINDAKAN JABATAN INTEGRITI & GOVERNANS

1. TARIKH TERIMA LAPORAN: 2. MASA TERIMA:

3. RUJUK NO FAIL: 4. SEKSYEN:

5. CATATAN:

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6. NAMA PENERIMA:

7. TANDATANGAN: