



**KUMPULAN PERANGSANG SELANGOR BERHAD
AND ITS SUBSIDIARY COMPANIES**

**WHISTLEBLOWING
POLICY & GUIDELINES**

APPROVED
REVISION No. 1

25 AUGUST 2011
25 MAY 2018

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ATTACHMENT

- A. WHISTLEBLOWING FORM ("WBF") (SAMPLE FORM)
- B. WHISTLEBLOWER PROTECTION ACT 2010

1.0 INTRODUCTION -

- 1.1 All employees are encouraged to raise genuine concerns pertaining to the Company at the earliest opportunity and in an appropriate way. It means that if employee believe there is a wrongdoing in the Company (e.g. Superiors or colleagues may be committing a criminal offence), he/she can report this by following the correct procedures and staff employment rights are protected.
- 1.2 Employees are often the first to realize that there may be serious wrongdoing within the Company. However, employees may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. Employees may also fear harassment or victimization. In these circumstances, employees may feel that it is easier to ignore the concern rather than report it.
- 1.3 The Company is committed to the highest standards of openness, integrity, probity and accountability. We encourage employees, with concerns pertaining to the Company to raise those concerns to the appropriate Authority.
- 1.4 The policy has been formulated in accordance with the provisions of the guidance under the Malaysian Code of Corporate Governance and in line with Global best practices and Whistleblower Protection Act 2010.

2.0 OBJECTIVES AND SCOPE OF THIS POLICY -

- 2.1 This policy aims to: -
 - i. Encourage employees, to question and act upon concerns pertaining to the Company at the earliest opportunity and in an appropriate manner.
 - ii. Provide avenues for employees, to raise those concerns and where possible, receive feedback on any action taken so that it can be addressed in an independent and unbiased manner.
 - iii. Reassure employees that he/she will be protected from possible reprisals or victimization for raising a concern as defines in the policy (Para 3.2)
- 2.2 This policy covers: -
 - i. Conduct which is an offence or a breach of law;
 - ii. Conduct which is a breach of the Company's Rules and Regulations, Financial Regulations or other policies or standards which the Company applies;
 - iii. Possible fraud and corruption;
 - iv. Disclosure related to possible miscarriage of justice;
 - v. Health and safety issues which is in violation of the relevant laws and standards;

- vi. Sexual or physical abuse; and
- vii. Other unethical conduct.

2.3 This policy is not intended for employees' grievance or complaint procedure (example: personal grievances concerning an individual's terms and conditions of employment, performance assessments, bonus and increment allocations or other aspects of the working relationship).

3.0 DEFINITION / ABBREVIATION

3.1 **Company/Perangsang Selangor**

Refers to Kumpulan Perangsang Selangor Berhad

3.2 **Key Management**

Refers to person in any of the following positions:

- i. Chief Executive Officer (CEO)
- ii. Chief Operating Officer (COO); and
- iii. Head of Department (HOD)

3.3 **AC**

Refers to Audit Committee of Perangsang Selangor

3.4 **Policy**

Refers to Whistleblowing Policy

3.5 **Reporting Individuals**

Refers to a person or group of persons who make/s a whistleblowing report. Such person or group of persons may include employees and/or third-party stakeholders.

4.0 REFERENCE

4.1 Whistleblower Protection Act 2010 [Laws of Malaysia Act 711]

4.2 Corporate Governance Guide – Towards Boardroom Excellence (Bursa Malaysia Securities Berhad)

5.0 PROTECTION UNDER WHISTLEBLOWING POLICY

5.1 **Harassment or Victimization**

- i. The Company shall not tolerate any harassment, discrimination or victimization (including informal pressures) and shall take appropriate action possible to protect the Reporting Individual;
- ii. Any employee who threatens retaliation against a Reporting Individual shall be subject to disciplinary action, including termination of employment;

- iii. A Reporting Individual who raises his concern under this policy shall not be at risk of losing his job or suffer any form of retribution as a result, thereof provided that:
 - The disclosure is made in good faith;
 - He/She reasonably believes that the information, and any allegations contained therein, are reasonably true; and
 - He/She is not acting for personal gain.
- iv. Notwithstanding, the act of lodging a report will not in itself protect the Reporting Individual from the consequences of improper conduct in which he/she may have been involved or implicated.

5.2 Confidentiality

- i. The Company recognizes that the Reporting Individual may want to raise a concern in a confidential manner. Any Reporting Individual wishing to protect his/her identity is at liberty to do so. All reports of wrongdoings and information received shall be treated in strict confidence to the fullest extent possible to protect the identity of the Reporting Individual.
- ii. If a situation arises where revealing the Reporting Individual's identity is necessary to resolve the matter (e.g. in a court proceeding and internal inquiries), this matter shall be resolved through consultation with the Reporting Individual.
- iii. Any reports of wrongdoings and/or matters related thereto shall not be disclosed or discussed with any third party other than those who have a legitimate need to know. This is important in order to avoid damaging the reputation of persons suspected but subsequently found innocent and discharged of wrongful conduct, as well as to protect the Company from potential civil liability.

5.3 Anonymous Allegations

- i. This policy encourages a Reporting Individual to put his/her allegation. Disclosures given anonymously are much less powerful and may create difficulties in resolving the issue or concern.
- ii. Disclosures lodged anonymously must contain sufficient information for consideration at the Company's discretion. Factors to be considered shall include:
 - Seriousness of the issues raised;
 - Credibility of the issues raised;
 - Likelihood of confirming the allegation from an attributable source; and
 - That the disclosure was done in good faith.

5.4 **Untrue, False, Malicious and/or Reckless Allegations**

- i. The Company is sincere in its efforts to address genuine concerns. If the Reporting Individual raises a concern in good faith but is not ascertained or upon investigation, no action will be taken against the Reporting Individual.
- ii. If the Reporting Individual raises a concern frivolously/maliciously or for personal gain, stern disciplinary action shall be taken against the Reporting Individual which may include termination of employment.

6.0 **HOW TO RAISE A CONCERN**

6.1 Concerns may be raised with your Immediate Superior or the designated Whistleblowing Officer. If an employee wishes to raise the concern anonymously, he/she can do so via the following channels:

- i. Whistleblowing Hotline at 03-5524 8448
- ii. Write a letter/whistleblowing form to:
Director
Internal Audit Department
Kumpulan Perangsang Selangor Berhad
Tingkat 17 Plaza Perangsang
Persiaran Perbandaran
40000 Shah Alam, Selangor Darul Ehsan
- iii. Email submission [whistleblowingofficer@kps.com.my]

Note: **Whistleblowing Form** can be downloaded via Perangsang Selangor website.

6.2 If employees feel that the matter is so serious and cannot be raised via any of the above channels, they should contact the Audit Committee Chairman at [ldris_bssb@hotmail.com], being the Director identified in the Company's Annual Report as one to whom concerns may be conveyed.

6.3 **Information Required When Lodging a Report**

When lodging a written report, the Report Individual shall try to provide the following information as required in the Whistleblowing Form (WBF) [Please refer to **Attachment 1**]:

- i. Background and history of the concerns, giving names, dates, places, facts and data where possible; and
- ii. Reason why the Reporting Individual is particularly concerned about the matter he/she has raised.

6.4 The Reporting Individual needs to demonstrate that there are reasonable grounds for his/her concern and that the report is done in good faith and not for personal interest. The earlier the concern is raised, the easier it is to take action.

- 6.5 The Whistleblowing Officer will inform the Reporting Individual within five (5) working days for:
- i. Acknowledging that the concern has been received and recorded; and
 - ii. Informing whether further investigations will take place and if not, stipulating the reason.

7.0 HOW THE COMPANY WILL RESPOND

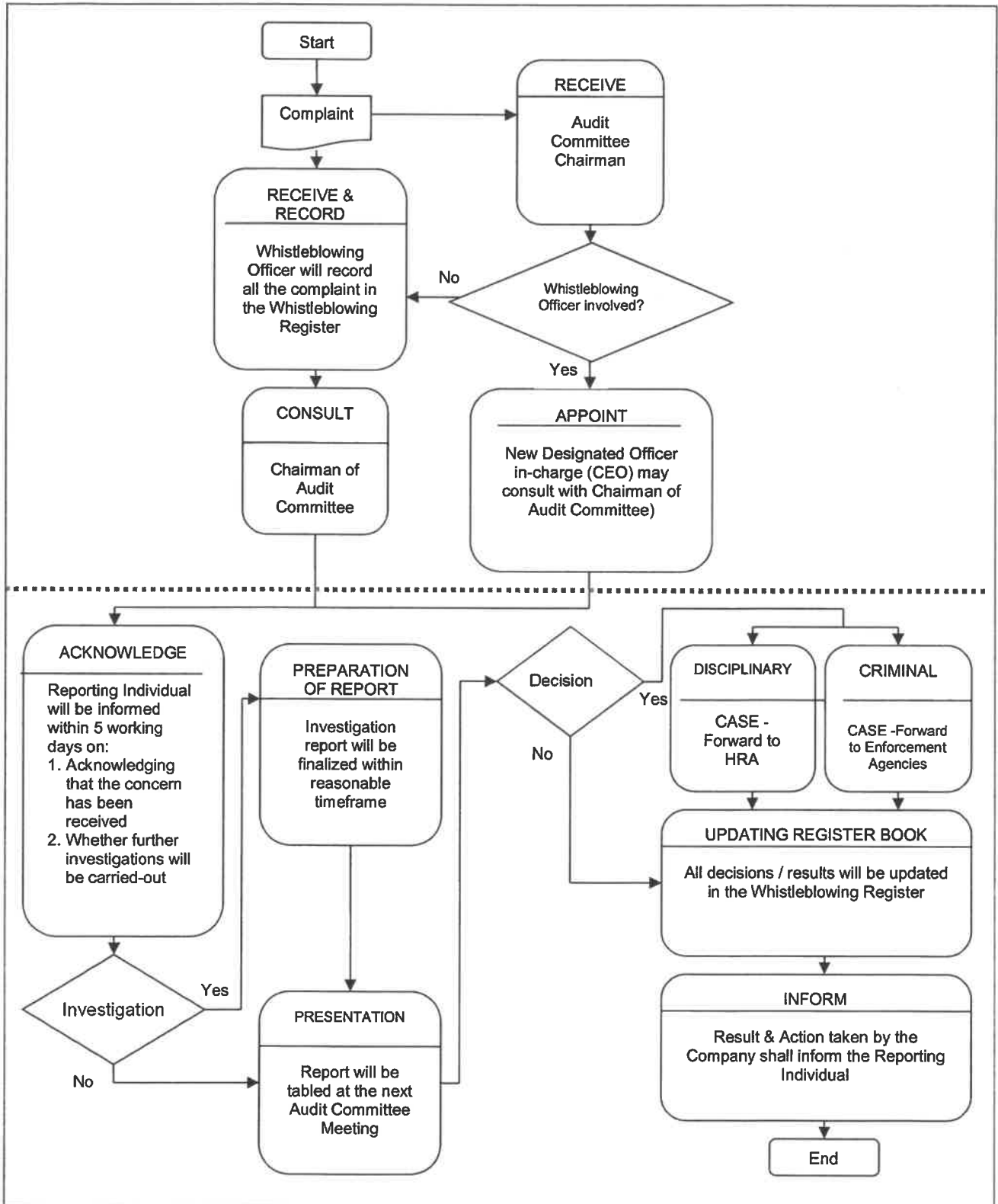
- 7.1 The Company's response will depend on the nature of the concern. It may be:
- i. Investigated internally;
 - ii. Referred to the internal/external auditor;
 - iii. The subject of an independent inquiry; and
 - iv. Referred to the Enforcement Agencies.
- 7.2 Initial reports of concern will be forwarded to the Company's Whistleblowing Officer who has the authority to act independently. The Whistleblowing Officer may consult others including Chairman of the AC, and will decide whether an investigation is warranted and, if so, what form it should take. The Whistleblowing Officer will decide to take no further action if a complaint appears to be trivial, malicious or mala fide. All such decision will be reported at the next AC Meeting in a summarized form.
- 7.3 If the concern raised involves the Whistleblowing Officer, the CEO, in consultation with the Chairman of the AC, will nominate another authorized Officer to conduct initial enquiries vested with the same authority as the Whistleblowing Officer.
- 7.4 Some concerns may be resolved by agreed action without the need for investigation. Any decision to solve matters in this way will be taken or confirmed and recorded by the Whistleblowing Officer. If urgent action is required, it may be taken before any investigation is conducted. Any action taken or agreed will normally be reported at the next AC Meeting.
- 7.5 If any investigation is required, the Whistleblowing Officer may consult with others including the Chairman of the AC and may designate an authorized Officer to investigate the concern.
- 7.6 The amount of contact between the officers considering the issues and the employee raising the concern will depend on the nature of the matter raised, the potential difficulties involved, relevance and clarity of the information provided.

- 7.7 Whistleblowing Officer will try to minimize any difficulties which the Reporting Individual may have as a result of raising a concern. For instance, if the Reporting Individual has to give evidence in criminal, civil or disciplinary proceedings, Whistleblowing Officer will advise for the Reporting Individual about the procedures.
- 7.8 Whistleblowing Officer accepts that the Reporting Individual needs to be assured that the matter has been properly addressed. Subject to legal constraints, Whistleblowing Officer will tell the Reporting Individual about the outcomes of any investigation. It is the Company's prerogative to decide whether to conduct an investigation and to decide the final outcome.
- 7.9 The Whistleblowing Officer will report the outcome of any investigation to the AC who will oversee the implementation of any recommendation arising from the investigation.
- 7.10 Whistleblowing Officer shall inform the Reporting Individual of the result of the investigation and action taken by the Company [as mentioned under Whistleblower Act 2010 Section 14 (6)].

8.0 ADMINISTRATION

- 8.1 All information gathered for each case shall be managed and restricted internally on a "need to know" basis only.
- 8.2 The Whistleblowing Officer has overall responsibility for the administration and enforcement of this policy, and may liaise as necessary with others including the Chairman of the AC.
- 8.3 The Whistleblowing Officer shall maintain proper records of concerns raised and the outcomes (but in a form which does not endanger employee confidentiality) and will report directly to the AC.

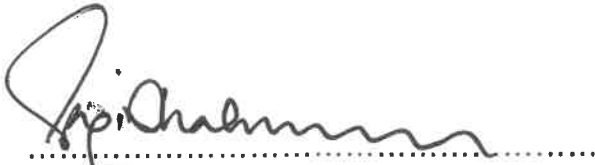
9.0 WHISTLEBLOWING PROCESS FLOW



HOW TO RAISE A CONCERN

HOW THE COMPANY WILL RESPONSE

Approved By:



YM Raja Shahreen Bin Raja Othman
Chairman, Kumpulan Perangsang Selangor Berhad

Dated: 12 July 2018

Noted By:



YBHG Dato' Idris Bin Md Tahir
Chairman of the Audit Committee, Kumpulan Perangsang Selangor Berhad

Dated: 12 July 2018

ATTACHMENT A

WHISTLEBLOWING FORM (WBF)

1. REPORTING INDIVIDUAL DETAILS

- 1.1) Name : _____
- 1.2) I/C Number : _____
- 1.3) Contact Number : _____
- 1.4) Designation & Department: _____
- 1.5) Date/Time : _____
- 1.6) Signature : _____

Note: You are encouraged to provide your name with this report. Concerns expressed anonymously are much less powerful but they will be considered so far as is possible. The recipient of the Whistleblowing Report will preserve confidentiality.

2. PARTIES INVOLVED

- 2.1) Party-1
- 2.1.1 Name : _____
- 2.1.2 Designation : _____
- 2.1.3 Company/Department : _____
- 2.2) Party-2
- 2.2.1 Name : _____
- 2.2.2 Designation : _____
- 2.2.3 Company/Department : _____

Note: Kindly use a separate sheet if more space is required.

2. REPORT PREFACE

Date/Period of Incident : _____

Evidence/Reference Documents (if any): _____

Reasons why are you particularly concerned about the situation:

3. REPORT DETAILS

[FOR OFFICE USE]

4. REPORT RECEIVED BY

5.1) Name : _____

5.2) Designation & Department: _____

5.3) Date/ Time : _____

5.4) Signature : _____