

# WHISTLEBLOWING POLICY

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## **1. Objective**

Edaran Berhad and its Group of Companies (the Company) are committed to protect the individuals who report in good faith instances or wrong doings or unacceptable behaviour occurring in the Company. This policy and procedure describe how the commitment is implemented. It is also an integral part of the Company's compliance in relation to Code of Conduct of Malaysian Code of Corporate Governance 2017. The objective is to encourage the reporting of the misbehaviours that may result in financial loss and reputation damage.

This Whistleblowing Policy and Procedure indicates that the Company is committed in maintaining the high standard of legal and ethical business behaviour. The policy and procedure apply to the Board of Directors and the Company's employees and it covers the process of reporting channel and guidance to disclose the wrongdoings. It also addresses the protection of individual who makes the report.

## **2. Improper Conduct**

For the purpose of this policy and procedure, improper conduct or wrongdoings may include but not limited to the following:

1. Fraud, corruption or dishonesty;
2. Mismanagement of the Company's resources;
3. Conflict of interest;
4. Conduct which likely cause substantial risk to public safety and health;
5. Conduct which likely cause substantial risk to environment;
6. Conduct that is contrary to, or breach of, Company's policy and procedure;
7. Unauthorised disclosure of the Company's confidential information;
8. Concealment of any or a combination of the above.

The disclosures of the improper conduct should be made to the Corporate Governance Team in the first instance.

The Corporate Governance Team members are:-

- Asbanizam Abu Bakar – Head, Group Legal & Secretarial
- Hashim Ishak – Head, Corporate Services, Edaran Trade Network
- Tengku Nazwa Naim Tengku Endut – Head, Group Financial Accounting
- Sariza Ibrahim – Group Manager, Human Resources Development
- Suhaili Ismail – Head, Internal Audit Department

## **3. Investigation Process**

Specific person/group would be responsible in carrying out the investigation under the Whistleblowing Policy and Procedure.

#### **4. Reporting, Investigation and Confidentiality**

1. The Company's employees are encouraged to report any genuine instances of unacceptable conduct.
2. The disclosure may be made orally or in writing. The disclosure made shall include the name of the individuals involved, witnesses and other information in the brief summary of the allegation.
3. All disclosures made will be treated confidential. The company will not disclose any information provided by the discloser, the identity of the discloser or any information that could lead to the discloser's identity being revealed.
4. All reports/disclosures shall be promptly investigated. If required, the investigator can obtain help from Human Resources Development, External Auditors or Internal Auditors.
5. The investigator is required to report all the concerns raised, any action taken or to be taken as the result of the investigation.
6. The Company shall retain the report and all the relevant documents received during the investigation and the disclosure for seven years.
7. The report including the action taken and the recommendation shall be submitted to the Board of Directors for deliberation and further action if the investigation confirms unlawful activities have been occurred in the company.

#### **5. Protection of the Whistleblower**

1. Whistleblower who discloses the inappropriate conduct in good faith and in accordance to the Whistleblowing Policy and Procedure shall be protected against any detrimental action, demotion, discrimination and adverse treatment.
2. The whistleblower's identity will be kept confidential to the extent possible.
3. Any other employee assisting in the investigation will also be accorded protection to the same extent as the whistleblower.
4. The Company reserves the rights to take disciplinary actions against the individual who:
  - Make report with the intention to misinform;
  - Wilfully disclose any matter knowing the matter to be false;
  - Wilfully disclose the Company's confidential information.