



# WHISTLE-BLOWING POLICIES AND PROCEDURES

## 1.0 OBJECTIVES

The objectives of these Whistle-blowing Policies and Procedures (“WB P&P”) are to: -

- 1.1 provide a mechanism for legitimate concerns related to, amongst others, fraud, financial irregularity, corruption, bribery, serious breaches of the Employees Code of Conduct and Ethics, non-compliance with laws and regulations or company policies, illegal, unethical or questionable practices etc. (collectively referred to as “Misconduct”) to be raised or reported, investigated and where necessary, appropriate action to be taken to resolve such issues promptly and effectively within Taliworks Corporation Berhad and its subsidiaries (“the Group”).
- 1.2 protect a complainant or whistle-blower (collectively referred to as “Whistle-blower”) from any form of harassment, reprisal or retaliation as a direct consequence of him or her reporting any legitimate concerns under this policy. The protection accorded is to encourage a Whistle-blower to report such legitimate concerns whilst removing any fear or risk or disclosure of his or her identity.

## 2.0 SCOPE

These WB P&P apply to any company under the Group (including all other entities in which the said company has control), to all levels of employees, any person associated with the Group as well as stakeholders of the Group.

## 3.0 DEFINITION

- 3.1 Whistle-blowing is generally taken to mean the disclosure of insider knowledge by an employee or stakeholder of any attempted/ suspected/ actual Misconduct within the Group.
- 3.2 Whistle-blower is a person who tells someone of a higher authority or reports through formal channel (i.e. the Whistle-Blowing Committee) about alleged Misconduct.



- 3.3 A person is deemed associated with the Group if he or she is a director, partner or employee of the Group or he or she is a person who performs services for or on behalf of the Group.

#### **4.0 RESPONSIBILITY**

The Whistle-Blowing Committee is responsible for the administration and investigation of reports of attempted/ suspected/ actual Misconduct received from Whistle-blowers.

#### **5.0 POLICY STATEMENT**

- 5.1 All reports of attempted/ suspected/ actual Misconduct is to be directed to the Whistle-Blowing Committee for assessment and investigation.
- 5.2 All information obtained from a Whistle-blower along with his or her identity will be treated as strictly confidential at all times and will not to be disclosed to other parties other than to the person empowered to investigate the case as provided in clause 6.6 below.
- 5.3 A Whistle-blower who lodges a legitimate concern will be protected, provided that it was made in good faith and that he or she is not later proved to have acted maliciously, vexatiously or frivolously or the report or complaint is manifestly untrue or he or she acted for personal gain or personal interest.
- 5.4 The Group views any allegation of harassment, reprisal or retaliation in any form or manner against a Whistle-blower reporting a legitimate concern seriously and will treat such action as gross misconduct, which if proven after due inquiry, may lead to disciplinary action, dismissal of the perpetrator(s) and/or other actions as maybe deemed appropriate.
- 5.5 The Group views any party leaking the Whistle-blower's identity and confidential information as a serious breach of protocol and will treat such action as gross misconduct, which if proven after due inquiry, may lead to disciplinary action, dismissal of the perpetrator(s) and/or other actions as maybe deemed appropriate.

#### **6.0 PROCEDURES**

##### **6.1.1 Employees**

If any employee has reasonable ground(s) for believing that any Misconduct has occurred or is occurring in the Group, the employee has the responsibility to verbally report or verbally disclose it in a timely manner to a higher



authority (e.g., his or her immediate superior generally) for speedy resolution, if possible.

Otherwise, the initiator or immediate superior may raise a formal report directly to: -

 the Whistle-Blowing Committee at <b>we_hear@lgb.com.my</b>
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The recipients of the email will be restricted and channelled directly to members of the Whistle-Blowing Committee.

**6.1.2 Other Stakeholders (other than Employees of the Group)**

For stakeholders other than employees of the Group, they may raise a formal report directly to the Whistle-Blowing Committee at the email address provided in clause 6.1.1 above.

**6.1.3 Manner in Which a Formal Report Can be Filed**

Where a written report is furnished to the Whistle-Blowing Committee, it should be sealed in an envelope and marked ***“Strictly Private & Confidential & to be Opened by Addressee only”***.

A hardcopy of the report to the Whistle-Blowing Committee can be addressed or hand delivered to:

<p><b><i>“Strictly Private &amp; Confidential &amp; to be Opened by Addressee only”</i></b></p> <p>The Whistle-Blowing Committee LGB Group Level 18, Menara LGB, 1 Jalan Wan Kadir, Taman Tun Dr. Ismail, 60000 Kuala Lumpur.</p>
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6.2 A Whistle-blower who submits a formal report (including allegations or complaints) to the Whistle-Blowing Committee must include the following information: -

- (a) Name, designation and company/division/department/unit and telephone contact number.



- (b) Specific description of the incident/case.
  - (c) The name of the individual(s) and entity involved.
  - (d) Documentary evidence, if any, to support the report.
  - (e) Particulars and contact numbers of witnesses, if any.
- 6.3 Anonymous reports are not encouraged, but they may be considered at the discretion of the Whistle-Blowing Committee.
- 6.4 All reports made will be acknowledged by the Whistle-Blowing Committee and immediately thereafter a preliminary investigation will be initiated to determine the validity of the report and whether it merits further investigation.
- 6.5 The Whistle-Blowing Committee may delegate the preliminary investigation to designated person(s) and the person(s) empowered to undertake the investigating will:
- (a) be independent and uninvolved in the issue (e.g., another appropriate manager or an appropriate third party);
  - (b) be given appropriate authority, resources and access by the Group to enable the investigation to be effectively carried out;
  - (c) possess legal and/or technical knowledge in the issue concerned (if applicable);
  - (d) preferably have had training or prior experience in conducting an investigation.
- 6.6 The person(s) designated by the Whistle-Blowing Committee to undertake an investigation may include: -
- (a) member(s) of the audit committee;
  - (b) senior independent director (for complaints relating to directors and other senior management positions);
  - (c) head of internal audit department;
  - (d) head of human resource department (for complaints related to staff misconducts); or



- (e) any other person(s) deemed competent to investigate the Misconduct.

In delegating the responsibilities, the Whistle-Blowing Committee will ensure that the designated person(s): -

- (i) is not conflicted;
- (ii) is not involved in the allegation / complaint filed by the Whistle-blower; and
- (iii) undertakes not to leak or disclose the Whistle-blower's identity and confidential information to other parties.

6.7 The investigation will promptly establish the facts and collect all necessary evidence by appropriate means, which may include the following:

- (a) making enquiries to establish the facts;
- (b) collecting together all relevant documents and other evidence;
- (c) obtaining witness evidence;
- (d) where possible and reasonable, requesting reports on the issue to be made in writing and signed by the individuals making them.

6.8 Once the investigation is completed, the Group will implement appropriate follow up actions. Depending on the circumstances and severity of the issue, the follow up actions could include one or more of the following: -

- (a) disciplining responsible personnel (which, depending on the severity of the issue, could range from a warning for a minor offence to dismissal for a serious offence);
- (b) reporting the matter to the authorities;
- (c) the Group may also take disciplinary action if any employee: -
  - (i) knowingly makes false or misleading reports about another person; or
  - (ii) acts in a retaliatory, discriminatory or otherwise adverse manner towards a person, as a result of that person making a genuine report or providing assistance in a relevant inquiry; or



- (iii) intentionally hinders or impedes a formal investigation or fails to assist the investigator(s) in the investigation.

6.9 The Whistle-Blowing Committee will keep the Whistle-blower informed in writing on the progress of the investigation (including the outcome of the preliminary investigation to establish a case for further investigation) and the conclusion arrived therefrom within a reasonable timeframe as soon as a decision is made.

## **7.0 THE WHISTLE-BLOWING COMMITTEE**

7.1 The duties and responsibilities of the Whistle-Blowing Committee are stated in their own written Terms of Reference.

7.2 Members of the Whistle-Blowing Committee shall comprise of no more than three (3) persons nominated by the management of the Group and their name identity will be made known and published on the Group's intranet/ website along with these WB P&P.

## **8.0 SUGGESTIONS FOR IMPROVEMENT TO THIS POLICY**

Any suggestions / proposals to improve on the effectiveness and adequacy of the WB P&P are welcomed and should be address to the Whistle-Blowing Committee at the email address stated in clause 6.1.1 above with the subject matter "*Whistle-blowing Policies and Procedures – Improvement Suggestions*".

## **9.0 VARIATION**

A copy of the WB P&P is made available for reference on the Group's intranet/ website (or where required, in the website of individual companies carrying its own company logo) and any revision(s) thereto will supersede all previous published versions.