



## WIDAD GROUP BERHAD

# WHISTLEBLOWING POLICY MANUAL

A handwritten signature in black ink, appearing to read 'Rizal', is positioned above a dotted line.

**DATO' DR. MOHD RIZAL MOHD JAAFAR**  
Group Managing Director

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## **1.0 POLICY STATEMENT**

Widad Group Berhad and its subsidiary companies (“WIDAD” or “the Group”) are committed to the highest standards of integrity, accountability and ethical in the conduct of its businesses and operations. The Group aims to conduct its affairs in an ethical and responsible manner and with openness and transparency, and these are in line with our corporate values of carrying out our business ethically and responsibly.

In implementing and upholding the abovementioned values, WIDAD provides avenue for all its employees, members of the public and third parties it engages, to disclose and report any improper conduct within the Group. Our Whistleblowing Policy (“Policy”) embodies clear and effective measures to ensure that disclosures are made in an effective manner, in good faith and protects whistleblower.

## **2.0 OBJECTIVE OF THE POLICY**

The objective of this Policy is to provide a mechanism for all employees and stakeholders of WIDAD to report their concerns about any actual or suspected incidence of wrongdoing, inappropriate behaviour or misconduct relating to fraud, corrupt practices and/or abuse involving our resources in a responsible and effective manner and on a timely basis for WIDAD to take appropriate actions.

This Policy is intended to be used as an ultimate remedy, if no other means are available to address the matter. For our employees, if you wish to raise a specific concern, you are encouraged to try to solve the matter through existing procedures and discuss the matter first with your line supervisor(s) or head of department before resorting to the whistleblowing procedure.

## **3.0 SCOPE OF THE POLICY**

This Policy is to cater and facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Instances of such improper conduct are:

- Any form of criminal offences, including fraud
- Bribery and corruption
- Money Laundering
- Abuse of power
- Conflict of Interest
- Theft or embezzlement
- Misuse of company’s property and information
- Non-compliance with WIDAD’s policies and procedures and applicable laws and regulation

The above list is however not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under WIDAD's Code of Conduct and Ethics or any criminal offence under applicable laws / legislations.

This Policy is not applicable to personal grievances concerning an individual's terms and conditions of employment, or any other aspects of working relationship with WIDAD or matters which are trivial in nature. Such matters shall be dealt with under WIDAD's Employee Handbook.

#### **4.0 DISCLOSURE PROCEDURES**

All disclosures are to be channelled in accordance with the procedures outlined under this Policy. Disclosure should be factual and contain only specific information to enable proper assessment of the allegation made.

#### **5.0 PROTECTION TO WHISTLEBLOWER**

This Policy, which is in line with Whistleblower Protection Act 2010 (Act 711), protects whistleblower who makes disclosures of improper conduct committed or about to be committed within WIDAD, and in good faith, against any detrimental or adverse action, or unfair treatment.

This Policy assures that concerns can be raised without fear of reprisal and identity of the whistleblower will be kept confidential, as required under the applicable laws. Such protection is accorded even if the investigation later reveals that the whistleblower has mistaken as to the facts and the application of rules and procedures or even that the outcome of the investigation later reveals that the allegation could not properly be substantiated.

#### **6.0 ANONYMOUS WHISTLEBLOWER**

We discourage anonymous disclosure of wrong doings and any improper conduct. Any employee of WIDAD or member of the public who wishes to report improper conduct is required to disclose his identity to WIDAD in order for WIDAD to accord necessary protection to him. However, WIDAD reserves its right to investigate into any anonymous disclosure.

## **7.0 NOTIFICATION**

Disclosures can be made either through the online Secured Post box or Direct Message to the [whistleblowing@widadgroup.com](mailto:whistleblowing@widadgroup.com), where this email is auto-forward to the Chairman of the Whistleblowing Committee and Chairman of Audit Committee.

Where appropriate, WIDAD may notify the whistleblower of the outcome of the disclosures made, upon completion of the whistleblowing process and procedures.

## **8.0 REVIEW OF POLICY**

This Policy shall be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the relevant governing legislations and regulatory requirements, or more frequently to reflect material changes to the relevant legislations and regulations or circumstances of the business.