

WCT HOLDINGS BERHAD WHISTLE BLOWING POLICY	POLICIES & PROCEDURES FOR REPORTING IMPROPER CONDUCT, WRONGDOINGS, CORRUPTION, FRAUD, AND/OR ABUSE
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Approved by the WCT Holdings Berhad
Audit Committee on 23rd February 2017

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WHISTLEBLOWING POLICY

INTRODUCTION

In line with good corporate governance practices and with the introduction of the Whistleblower Protection Act 2010, the Board and Management of WCT Holdings Berhad and its group of companies (“the Company”) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

OBJECTIVES

The objective of this policy and procedures is to provide an avenue and a mechanism for any reporting individual (“the whistleblower”) to report any concerns they may have regarding any suspected and/or known misconduct, wrongdoings, corruption, fraud and/or abuse.

POLICY & PROTECTION

a. Anonymity

The whistleblower is allowed to either identify himself/herself or if he/she prefers, to remain anonymous when reporting suspected and/or known instances of misconduct, wrongdoings, corruption, fraud and/or abuse.

b. Assurance against reprisal and/or retaliation

Where the whistleblower has chosen to reveal his/her identity, it is the policy of the Company to provide assurance that the whistleblower would be protected against reprisals and/or retaliation from his/her immediate superior or head of department / division or the person in respect of which his/her report is made. In addition, the Company provide assurance that no disciplinary action can be taken against the whistleblower as long as he/she does not maliciously, intentionally, knowingly or recklessly provide false information in the report.

c. Confidentiality

The Company shall treat all reports or disclosures as confidential and will only reveal information on a “need to know” basis or if required by law, court of competent jurisdiction or lawful authority. The identity and particulars of the whistleblower shall also be kept confidential UNLESS the whistleblower chose to reveal his/her identity. Where the whistleblower chose to reveal his/her identity when making such report, written permission from the whistleblower would be obtained before the information is released.

d. Indemnity

Provided the report was made by the whistleblower in good faith and without negligence, the Company will fully indemnify and shall save the whistleblower harmless from all loss, damage, liability, penalty, costs and/or expenses (*including legal costs and expenses, provided the whistleblower consents to and appoints the law firm nominated by the Company for the conduct of the legal proceedings*) incurred and/or suffered as a result of any legal proceedings (*whether criminal or civil*) that may be brought against the whistleblower in respect of such report.

e. Relocation

The whistleblower may request for a relocation of his/her place of employment at the discretion of the Company.

f. Protection

The Company will also take all reasonable steps to ensure the whistleblower will, in relation to the report, be protected against:-

- i. action causing injury, loss or damage;
- ii. intimidation or harassment;
- iii. interference with the lawful employment of the whistleblower, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the whistleblower's employment, career, profession, trade or business or the taking of disciplinary action; and
- iv. a threat to take any action in paragraph (i) to (iii) above. Where necessary, any person related or associated with the whistleblower (*e.g. immediate family members*) shall be accorded with similar protection mentioned in this paragraph (f).

The protection conferred above is:

- i. Not limited or affected in the event that the disclosure does not lead to any disciplinary action or prosecution of the person whom the disclosure of the improper conduct, wrongdoings, corruption, fraud and/or abuse was made;
- ii. However restricted to the whistleblower and his/her immediate family members.

REVOCATION OF POLICY & PROTECTION

The protection stated in above shall be revoked by the Company if:

- i. The whistleblower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud and/or abuse;
- ii. The whistleblower made his/her disclosure without good faith;
- iii. The disclosure was frivolous or vexatious; or
- iv. The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistleblower himself/herself.

PROCEDURES FOR REPORTING IMPROPER CONDUCT, WRONGDOINGS, CORRUPTION, FRAUD AND/OR ABUSE

- a. If a whistleblower suspect that improper conduct, wrongdoings, corruption, fraud and/or abuse has occurred, the whistleblower is encouraged to report it through e-mail or mail (using the attached from as per *Appendix 1*) to the following:-

Audit Committee Chairman
WCT Holdings Berhad
B-30-01, The Ascent, Paradigm
No. 1 Jalan SS7/26A, Kelana Jaya
47301 Petaling Jaya Selangor
Tel: 03-78066688 / Fax: 03-78066633
Email: whistleblower@wct.my

The disclosure must at least have details of person(s) involved, nature of allegation, when and where the incident took place as well as the supporting evidence, if any.

b. Action

- All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group (*e.g. Internal Audit, Human Resource & Admin Department, Legal Department etc.*). The progress of investigation will be reported to the Audit Committee no later than the next immediate scheduled meeting.
- The person making an anonymous report will be advised that maintaining anonymity may hinder an investigation. If despite such advise, the whistleblower nonetheless wants to remain anonymous, his/her anonymity will be maintained as long as it is permitted by law or until the whistleblower indicates that he no longer wishes to remain anonymous.
- Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by Audit Committee will be implemented immediately.
- Where possible, steps will also be implemented to prevent similar situation arising.

REVIEW OF THE POLICY

The Policy is subject to review upon request by Audit Committee / statutory requirement.

CORPORATE RECORDING AND MONITORING

Audit Committee shall appoint a Monitoring Officer who shall maintain a corporate register of all concerns raised by whistleblowers. Monitoring Officer will review the corporate register and produce an annual report for Audit Committee. The report will include a summary of the concerns raised, to which department they related, the post to which the concerns related (if not confidential) and any lessons learned. The report will not include any employee names. The aim of this is to ensure that:-

- the relevant department learns from mistakes and does not repeat them, and
- consistency of approach across the departments

The corporate register together with the annual reports will be available for inspection by internal and external audit, after removing any confidential details.

Whistleblowing Report Form

Complainant Details

Name*	
Contact number	
Email*	

Details of Allegation

Person's Involved*	
Location*	
Date & Time*	
Incident/Details of Allegation*	<ul style="list-style-type: none"> • What, Who, When, Where, Witness • Please provide evidence to support the claim
How Incident Was Detected*	

Note: It is necessary to provide your name and contact number so that we can contact you for additional information of the reported concern (if necessary).