

	<b>Document Title</b>	: Whistle Blowing Policy		
	<b>Reference No.</b>	: 04-1-0002		
	<b>Revision No.</b>	: 1	<b>Effective Date</b>	: 23 Feb 2017


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## SECTION 1 – INTRODUCTION

### 1.1 BACKGROUND

1.1.1 POS MALAYSIA BERHAD (Pos Malaysia) Group of Companies requires its employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Pos Malaysia commitment to transparency, integrity and accountability is reflected in the Board of Directors' decision to approve the establishment of the whistle blowing programme.

### 1.2 OBJECTIVE

1.2.1 Pos Malaysia aims to develop a culture of openness whereby employees shall practice honesty and integrity in fulfilling their responsibilities and complying with all applicable laws, regulations, procedures and policies of Pos Malaysia.

1.2.2 Hence, it is fundamental that any concerns, which the employees or members of the public may have about suspected malpractice within Pos Malaysia, are aired to the right channel. It is clearly in Pos Malaysia interest to ensure malpractice does not occur. Pos Malaysia had devised a policy and procedure to cover the airing of genuine concerns about malpractice or suspected malpractice.

### 1.3 SCOPE OF THE POLICY


1.3.1 Whistleblower encompasses Board of Directors, employees (both permanent as well as contract), and members of the public, where relevant.

1.3.2 This policy makes it clear that a whistleblower can officially raise their concerns without fear of victimization, subsequent discrimination or put in disadvantageous position.

1.3.3 The policy is not intended to be used by employees wishing to raise concerns about their personal employment status in Pos Malaysia.

1.3.4 The policy provides a confidential and secure means to enable the whistleblower to raise concerns about conduct that is contrary to applicable laws, regulations, policies and procedures that can affect our business activities where ethical behavior particularly important. Those conducts include:-

- Unethical practices in accounting, internal controls and financing reporting;
- Sexual harassment;
- Criminal offences or breaches of law (for example : Money laundering, fraud bribery and corruption);
- Conflict of interest;
- Other unethical conduct (for example : Miscarriage of justice, deliberate concealment of any malpractices);
- Breaches of Company's policy; and
- Destruction of Company's assets.

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1.3.5 Any allegation made maliciously or for personal gain by Pos Malaysia employees, shall be subjected to disciplinary action, up to including termination of employment.

## **SECTION 2 – POLICY STATEMENT**

### **2.1 HARRASMENT OR VICTIMIZATION**

2.1.1 Pos Malaysia is committed to ensure good practice and high standards and fully supports its employees and the public to come forward to report any misconduct. Pos Malaysia recognizes that the decision to report a concern can be difficult and hence if the reported concerns are genuine, the whistleblower should be protected.

2.1.2 Pos Malaysia will not tolerate any harassment or victimization (including indirect pressure) and will take appropriate action to protect the whistleblower when the concern raised is genuine.

2.1.3 An employee who retaliates against a whistleblower, who has reported an improper conduct on good faith, will be subjected to disciplinary action, including the termination of employment.

### **2.2 CONFIDENTIALITY**

2.2.1 All concerns will be treated in confidence and every effort will be made to maintain strict confidentiality of an employee's identity consistent with the need to conduct an adequate investigation.


2.2.2 Confidentiality shall be maintained by the person to whom a disclosure is made as far as possible. The identity of the whistleblower shall not be made known to the person who is the subject of the disclosure without written consent from the whistleblower.

2.2.3 The identity of the whistleblower shall not be revealed to anyone including Senior Management and Board of Directors.

### **2.3 SAFEGUARDS**

2.3.1 This policy is designed to offer protection to those employees or members of the public who raised concern as defined in paragraph 2, provided the disclosure is made:

- To the Head of Internal Audit, the Group Chief Executive Officer, the Board Audit Committee Chairman and/or the Senior Independent Director;
- In good faith; and
- In the reasonable belief of the whistleblower that the concern are factually accurate and genuine.

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2.3.2 Employees who raised a concern in accordance with the policy will not be subjected to disciplinary action or other detriment. If the allegations are made maliciously or for the personal gain or other in good faith, he / she shall be subjected to disciplinary action, up to including termination of employment.

## 2.4 ANONYMOUS DISCLOSURE

2.4.1 This policy mandates the whistleblower to disclose his/her identity. However, the Company reserves its right to investigate into any anonymous disclosure.

## 2.5 PROCEDURE

### 2.5.1 Raising a concern

A whistleblower can raise his/her concerns on any misconduct listed under section 1.3.4 to:

- (i) the Head of Internal Audit;
- (ii) the Group Chief Executive Officer;
- (iii) the Board Audit Committee Chairman; and/or
- (iv) the Senior Independent Director.

### 2.5.2 A whistleblower may use any of the following means to express their concerns:

- (i) Mail;
- (ii) E-mail ([wb@pos.com.my](mailto:wb@pos.com.my)); and
- (iii) Phone (Head of Internal Audit: 03-2267 2050).


Any complaints and concerns regarding the Head of Internal Audit can be channeled directly to the Board Audit Committee Chairman.

Any complaints and concerns regarding the Group Chief Executive Officer can be channeled directly to the Board Audit Committee Chairman and/or the Senior Independent Director.

Any complaints and concerns regarding any members of the Board of Directors can be channeled directly to the Board Audit Committee Chairman and/or the Senior Independent Director.

## 2.6 ROLES AND RESPONSIBILITIES

2.6.1 The Head of Internal Audit, the Group Chief Executive Officer, the Board Audit Committee Chairman and/or the Senior Independent Director are responsible for receiving and acknowledging complaints / concerns made by the whistleblower. All concerns / complaints must be acknowledged by the person contacted and logged by Internal Audit.

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- 2.6.2 The whistleblower will be notified by the contacted person indicating whether:-
- The concern has been investigated and acted upon; or
  - The concern has been investigated and dismissed (including the reasons why the concern is dismissed).

2.6.2 The Board Audit Committee and/or the Group Chief Executive Officer will provide decision on the recommendations tabled by Internal Audit.

## 2.7 REPORTING OUTCOMES


2.7.1 In all cases, a report of the outcome of any investigation will be prepared by Internal Audit for the knowledge and action of the Board Audit Committee and/or the Group Chief Executive Officer which the case maybe. A summary of all reported cases will be prepared quarterly to the Board Audit Committee and the Group Chief Executive Officer to enable them to monitor the effectiveness of the procedures.

2.7.2 If an employee has raised a concern under this policy and procedures, under no circumstances should the employee communicate the information provided, or matters arising from the investigation, to any person or persons internally or externally, except as required by the relevant authorities.

## 2.8 REQUIREMENTS FOR SUCCESSFUL IMPLEMENTATION

2.8.1 The success of the whistle blowing initiative is subject to Pos Malaysia wide implementation of programmes that meet the following requirements:-

- The integrity and professionalism of the Head of Internal Audit, the Group Chief Executive Officer, the Board Audit Committee Chairman and/or the Senior Independent Director .
- The identity of the whistleblower shall be protected.
- Whistle blowing communication channels must be readily accessible, secure and must provide anonymous reporting to protect the identity of the whistleblowers.
- Whistleblowers must be informed of the facilities and the protection and the protection available to them.
- The Board Audit Committee and the Group Chief Executive Officer must monitor the progress towards the satisfactory resolution of the reported issues.

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Process	Duration	Responsibility	Supported Document(s) and Record
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>Concern Received by Head of Internal Audit, Group Chief Executive Officer, Board Audit Committee Chairman and/or Senior Independent Director</p> </div>		<p><b>Whistleblower</b></p> <p><b>The person contacted by Whistleblower</b></p>	<p><b>Acknowledgement of receipt</b></p>
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>Internal Audit conducts investigation</p> </div> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>Investigation outcome &amp; recommendation</p> </div>		<p><b>Internal Audit</b></p> <p><b>Internal Audit</b></p>	<p><b>Complaints logged</b></p> <p><b>Investigation report</b></p>
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>Board Audit Committee and/or Group Chief Executive Officer to make decision &amp; authorize action</p> </div> <div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 10px auto;"> <p>End</p> </div>		<p><b>Board Audit Committee and/or Group Chief Executive Officer</b></p> <p><b>The person contacted by Whistleblower</b></p>	<p><b>Notification to Whistleblower</b></p>