



SDB

Selangor Dredging Berhad

Registration No. 196201000105 (4624-U)

WHISTLEBLOWING POLICY

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WHISTLEBLOWING POLICY

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WHISTLEBLOWING POLICY

1.0 OBJECTIVE

Selangor Dredging Berhad (“**SDB**” or “**Company**”) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. This policy outlines the requirements and processes involved in the reporting of misconduct or wrongdoings concerning SDB that contravene our Brand Promise, Core Values or Code of Business Conduct and Ethics and the handling of such reports. This policy is applicable to SDB and its subsidiaries and where applicable, references to SDB shall be taken and read to include its subsidiaries.

2.0 POLICY

The objective of this policy is to provide a safe avenue for SDB’s employees and members of the public to report or disclose any improper conduct or wrongdoing concerning SDB and to provide protection for employees and members of the public who report such allegations. Protection of confidentiality of whistleblower will be accorded to employees and members of the public, with employees being given the additional protection that he / she will not be subject to detrimental action or retaliatory actions at the workplace.

IMPORTANT NOTE: Whilst SDB welcomes disclosures about possible irregularities concerning SDB, whistleblowers are cautioned against disclosing confidential information previously disclosed to the following authorities to SDB:

- (a) The Malaysian Anti-Corruption Commission;
- (b) The Royal Malaysian Police;
- (c) The Royal Malaysian Customs Department;
- (d) The Immigration Department;
- (e) The Road Transport Department;
- (f) The Securities Commission; and/or
- (g) The Companies Commission of Malaysia (collectively, the “Authorities”).

Disclosing confidential information already disclosed to the Authorities to any third parties, including SDB amounts to an offence under Section 8 of the Whistleblower Protection Act (“**WPA 2010**”), which if convicted, the whistleblower is expose to a penalty of up to RM50,000, a jail term of up to 10 years, or both. Such disclosure would further result in the whistleblower losing the protection of confidentiality, protection from detrimental action, and protection from civil, criminal and disciplinary actions afforded by the Authorities.

To ensure all stakeholders’ interest are protected, SDB will request for a declaration from whistleblowers that information disclosed to SDB is not confidential information already disclosed to the Authorities, in order for SDB to comply with Section 8 of the WPA 2010. This declaration is set out in the Whistleblowing Report Form set out in **Appendix 1** below.

3.0 SCOPE

This policy is applicable to all stakeholders and employees (which, for the avoidance of doubt, shall include permanent, contract, temporary employees and interns).

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This policy applies to the witnessing or discovery or suspicion of misconducts or wrongdoings concerning SDB such as:-

- a. Fraud;
- b. Bribery;
- c. Abuse of Power;
- d. Conflict of Interest;
- e. Theft or embezzlement;
- f. Misuse of Company's Property;
- g. Non-Compliance with Company Policies

The above list is not exhaustive and may be added or changed as required from time to time.

This Policy applies also to any acts, omissions, irregularity, or suspected act of irregularity involving employees, members of management whether individually, within the Company or with external parties, which if proven, will constitute an act of misconduct towards the Company or criminal offence under relevant legislations in force.

4.0 DEFINITIONS

HOD	: Head of Department
HR	: Human Resources
GGM	: Group General Manager
MD	: Managing Director
WBC	: Whistleblowing Committee

5.0 POLICY DETAILS

5.1 Ownership and Responsibility

5.1.1 Employees are to comply with the relevant policies, procedures and ethical work practices.

5.1.2 An employee discovering or suspecting the occurrence of misconduct or wrongdoings such as those stated in 3.0 is responsible to report such acts to the respective HOD, HR or GGM with evidence to support the incident.

Alternatively, employees can lodge a report of the incident by emailing to whistleblowing@sdb.com.my a completed Whistleblowing Report Form as per **Appendix 1** or return the completed form by hand or by post addressed to the WBC at 18th Floor, West Block, Wisma Golden Eagle Realty, 142-C, Jalan Ampang, 50450 Kuala Lumpur, Malaysia. The Whistleblowing Report Form can be downloaded from the Company's website www.sdb.com.my.

5.1.3 Third parties, i.e. vendors, contractors, consultants or customers, working for / with the Company and the general public can also lodge a report of known or suspected misconduct or wrongdoings such as those stated in 3.0 by emailing to whistleblowing@sdb.com.my a completed Whistleblowing Report Form as per **Appendix 1** or return the completed form by hand or by post addressed to the WBC

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at 18th Floor, West Block, Wisma Golden Eagle Realty, 142-C, Jalan Ampang, 50450 Kuala Lumpur, Malaysia. The Whistleblowing Report Form can be downloaded from the Company's website www.sdb.com.my.

- 5.1.4 WBC is responsible for conducting investigation to validate the claim and where necessary, the execution of Domestic Inquiry.

5.2 Ensuring Anonymity and Information Security

- 5.2.1 The whistleblower may identify himself / herself or remain anonymous when reporting suspected or known misconduct and wrongdoings.
- 5.2.2 The identity of the whistleblower shall be kept confidential unless required to be disclosed by law for instance, if the whistleblower is subsequently required to come forward as a witness in accordance with any applicable laws and regulations.
- 5.2.3 No employee who in good faith reports any incidents / instances of misconduct shall suffer harassment, retaliation or adverse employment consequence.
- 5.2.4 An employee who retaliates against someone who has reported any incidents / instances of misconduct in good faith is subject to disciplinary action including termination of employment.
- 5.2.5 The identity of the accused will also be held confidential except to those involved in the investigation, GGM and MD.
- 5.2.6 Information related to the case will be kept within the parties required to conduct the investigation and Domestic Inquiry until a verdict is obtained. Thereafter, the case may be shared with other employees as required by the GGM and MD.
- 5.2.7 Persons within SDB who are identified in the whistleblowing report will not be allowed to participate or be in any manner involved in the process of handling, investigating and reporting of the alleged misconduct or wrongdoing.

5.3 Reporting Requirements

- 5.3.1 The whistleblower needs to provide the following information:
 - a. The case details (who, what, when, where, how);
 - b. The actual act observed;
 - c. The reason or basis for acts of suspicion; and
 - d. Any available form of evidence or other witnesses to support the reported incident.

Any anonymous report will be considered at the discretion of the Company based on the nature of the report including supporting credible evidence.

- 5.3.2 SDB may, as it deems appropriate, direct the whistleblower to report the case directly to the appropriate authority if the whistleblower is in possession of prima facie evidence of misconduct by any employee or member of management which is believed to constitute corruption, partaking in any corruption activities or any equivalent offence.

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5.4 Investigation and Domestic Inquiry

- 5.4.1 All whistleblowing reports received shall be acknowledged within 24 hours upon receipt of all required information and the WBC will assess the report prior to determining the next course of action to be taken based on, inter alia, the severity of the claim and the credibility of information received.
- 5.4.2 Once the case has been determined as having merit on the face of it, the WBC will conduct investigation with the parties related to the case to establish the validity of the claim.
- 5.4.3 Upon confirmation and collection of sufficient evidence, the WBC may take one or more of the following actions as it deems appropriate:
 - a. inform GGM and MD;
 - b. inform the Audit Committee of the outcome of the investigation if the WBC considers the severity of the matter warrants a report to the Audit Committee;
 - c. inform the whistleblower on the findings;
 - d. conduct a Domestic Inquiry against the employee involved;
 - e. make a police report if the misconduct or wrongdoing constitutes a criminal offence; and / or
 - f. recommend preventive measures to be taken.

5.5 Disciplinary Actions

- 5.5.1 Where the misconduct or wrongdoing concerns an employee, the type of disciplinary action that would be imposed against the employee would depend on the severity of the case and will be in line with the punitive actions described in the Industrial Relations SOP.
- 5.5.2 In cases where applicable, SDB reserves the right to report the case and submit the supporting documents to the appropriate authority for further action in addition to any disciplinary action which may be imposed.

5.6 False Accusation

- 5.6.1 We assume all whistleblowing report is done with honorable intentions to protect SDB and will be treated as such until proven otherwise.
- 5.6.2 Any employee found deliberately reporting false accusation due to malice, vengeance or based on hearsay will be subjected to the relevant disciplinary investigation, inquiry and actions (as per Industrial Relations SOP).
- 5.6.3 For the avoidance of doubt, SDB reserves the right not to act upon any whistleblowing report received which it deems to be frivolous or malicious or false.

6.0 FURTHER CLARIFICATION

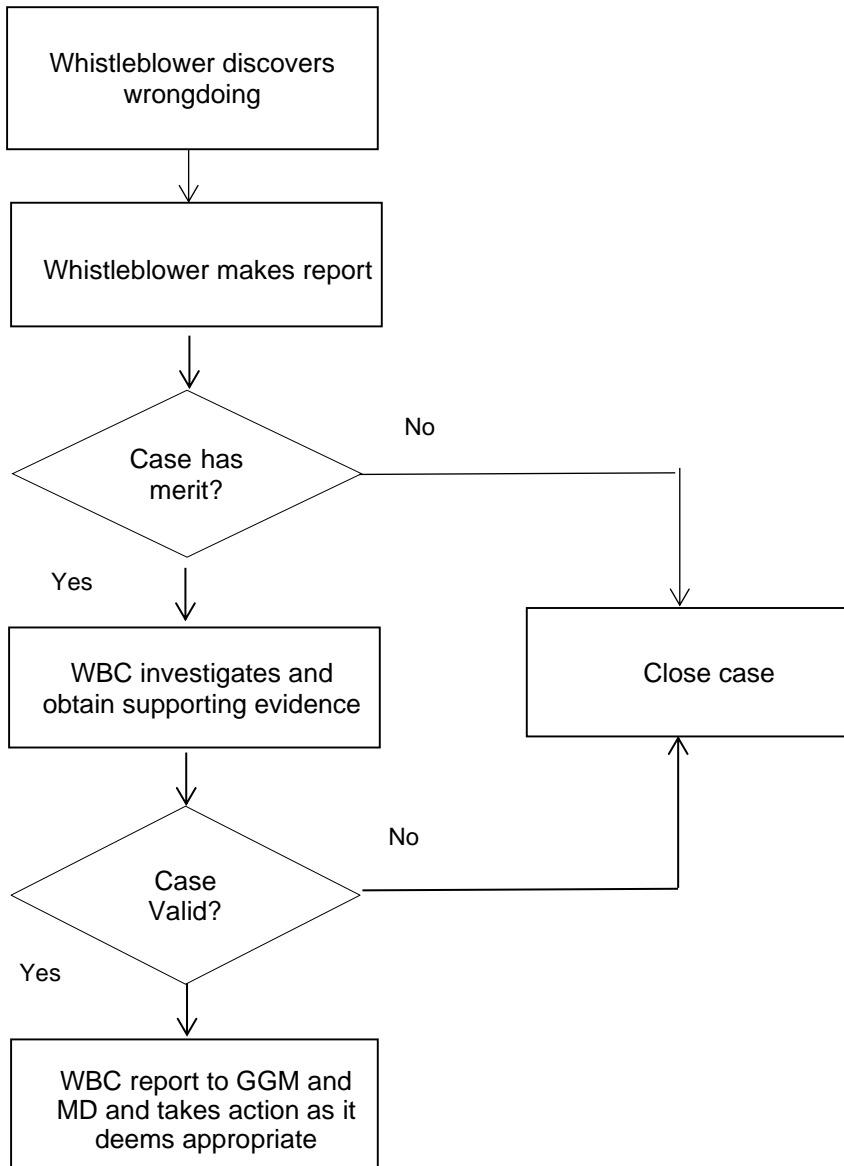
- 6.1 Employees and stakeholders who require clarification on this policy may email his/her queries to whistleblowing@sdb.com.my.

7.0 POLICY UPDATE

- 7.1 SDB may amend this policy from time to time, as and when necessary, to ensure that this policy best reflects the highest standard of integrity, openness and accountability in the conduct of its businesses and operations.

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Process Flow



APPENDIX 1
WHISTLEBLOWING REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact SDB and submit the information directly to whistleblowing@sdb.com.my or return the completed form by hand or by post to Selangor Dredging Berhad, Whistleblowing Committee at 18th Floor, West Block, Wisma Golden Eagle Realty, 142-C, Jalan Ampang, 50450 Kuala Lumpur, Malaysia.

All information disclosed in this whistleblowing report will be kept strictly confidential.

We may need to obtain further information or call upon your assistance during the investigation stage. As such, to the extent practicable, please provide your contact details.

WHISTLEBLOWER'S CONTACT INFORMATION <i>(This section may be left blank if whistleblower wants to remain anonymous)</i>	
NAME / ID NO. / BADGE NO.	
DESIGNATION	
DEPARTMENT / OPERATION	
CONTACT NUMBERS	
E-MAIL ADDRESS	
SUSPECT(S)' INFORMATION <i>(must be provided)</i>	
NAME / ID NO. / BADGE NO.	
DESIGNATION	
DEPARTMENT / OPERATION	
CONTACT NUMBERS	
E-MAIL ADDRESS	
WITNESS(ES) INFORMATION <i>(if any, to be provided)</i>	
NAME	
DESIGNATION	
DEPARTMENT	
CONTACT NUMBERS	
E-MAIL ADDRESS	
ALLEGATION NO.	

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COMPLAINT: Briefly describe the misconduct / improper activity and how you came to know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.

Note: * - You **SHOULD NOT** attempt to obtain evidence for which you do not have a right to access since whistleblowers are “reporting parties” and **NOT** “investigators”.

1. What is the nature of the misconduct / improper activity?

2. Who committed the misconduct / improper activity?

3. When did it happen and when did you notice it?

4. Where did it happen?

5. Is there any evidence that you could provide to us?*

6. Are there any other details or information which could assist us in the investigation?

7. Do you have any others details or information which would assist us in the investigation?

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I hereby confirm by disclosing the information set out in this Whistleblowing Report to SDB, I am not in breach of Section 8 of the Whistleblower Protection Act 2010 (“**WPA 2010**”).

Yes []

No []

Please confirm your declaration by ticking the yes box. If you do not wish to provide a confirmation, SDB will need to take additional steps to verify the information disclosed is not in breach of Section 8 of the WPA 2010, including but not limited to reaching out to you to solicit further information. This will in turn result in delays to the investigation of the matter reported. Please also be informed that the SDB may not proceed with the investigation of your report if SDB cannot be reasonably certain that the information you have provided is not in breach of Section 8 of the WPA 2010.

Date:

Signature / E-signature: