**WHISTLEBLOWING: POLICY & PROCEDURES**

1. **Policy Statement**
   1. Protasco Berhad expects high standard of integrity from all employees. It takes a serious view of any misconduct or wrongdoing of its employees with respect to their obligations for the Group's interests.
   2. This Whistleblowing Policy is established to help employees and other stakeholders to raise their concerns without fear of retaliation on any known and/or suspected misconduct, wrongdoings, corruption, fraud or any other acts as illustrated below.
   3. The Group shall pursue to the fullest extent of the law all acts of wrongdoing. It is advisable that any issues to be raised are current to ensure the availability and access to witnesses and documents.
2. **Objectives**

This Policy is established with the following objectives:-

* 1. To enable the employee to raise any concerns of integrity and misconduct in timely and systematic manner;
  2. To protect the employees from reprisal or unfair treatment for disclosing concerns in good faith in accordance with the Policy and;
  3. To develop a culture of accountability, integrity and good governance practices within the Company.

1. **Authority**
   1. The Board of Protasco Berhad holds the authority to approve this Policy and any amendments thereto;
   2. The Audit Committee of Protasco Berhad is entrusted to review this Policy and any amendments thereto before the Policy is submitted to the Board for approval;
2. **Scope**
   1. The scope of this Policy covers any acts of wrongdoing which is:
      1. Unlawful
      2. Breach of Protasco Berhad’s rules, regulations, policies and procedures, both expressed and implied
   2. Matters to which this disclosure may relate include:
      1. Malpractice, impropriety, fraud and embezzlements
      2. Misappropriation of funds
      3. Bribery
      4. Abuse of Power
      5. Conflict of interest
      6. Criminal breach of trust
      7. Illicit and corrupt practices
      8. Questionable or improper accounting
      9. Misuse of confidential information
      10. Acts or omission, which are deemed to be against the interest of the Group, laws, regulations or public policies
      11. Breaches of any Group policies or procedures
      12. Attempts to deliberately conceal any of the above matter or other acts of wrongdoing.

The above list is not exhaustive and the scope should cover any concerns that would be in the Group’s interest that they be addressed, corrected and/or for any other appropriate actions to be taken.

* 1. This Policy is not intended as a substitute or alternative for any other applicable grievance or complaints procedures; for example, personal grievances concerning an individual’s terms and conditions of employment, performance assessments, compensation or other aspects of the working relationship. Rather, this Policy is primarily to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company.

1. **Applicability and Severability** 
   1. This Policy shall supplement, and be read in conjunction with Protasco Berhad’s Policies and Procedures Manual, any rules regulations, policies and procedures of Protasco Berhad, both expressed and implied.
   2. Subject to the requirement of applicable local jurisdiction, this Policy applies to all employees of Protasco Berhad and its subsidiaries. This Policy also applies to members of the public, where relevant.
2. **Protection**
   1. **Confidentiality**
      1. Protasco Berhad recognizes that the reporting individual may want to raise a concern in a confidential manner. As such, reports of wrongdoing and information received shall be treated in confidence to the fullest extent possible to protect the identity of the Reporting Individual under the Malaysian Whistleblower Protection Act 2010.
      2. An employee who whistle-blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within Protasco Berhad, to the extent reasonably practicable, provided that the disclosure is made in good faith.

* + 1. Any reports of wrongdoing and/or matter related thereto shall not be disclosed to any party other than those who have a legitimate need to know. This is to prevent damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct, and to protect the Group from potential civil liability.
  1. **Anonymous Allegations**
     1. The Group acknowledges that a Reporting Individual may want to maintain anonymity. However, **any anonymous disclosure will not be entertained**. Any employee or member of the public who wishes to report improper conduct is required to disclose his/her identity to the Company in order for the Company to accord the necessary protection to him/her.
     2. Nonetheless, the Company reserves its rights to investigate into any anonymous disclosure provided that it contains sufficient information for consideration of the Company. Factors to be considered include:-
* Seriousness of the issues raised
* Credibility of the issues raised
* Likelihood of confirming the allegation from an attributable source
* That the disclosure was done in good faith
  1. **Untrue, False, Malicious, Mischievous, Vexatious and/or Reckless Allegations**
     1. Any untrue, false, malicious, mischievous, vexatious or reckless allegations and the abuse of this whistleblowing mechanism are prohibited.
     2. Should it be found that the Reporting Individual had acted in such a manner, he shall be subjected to disciplinary action including termination of employment.
     3. In the case that the Reporting Individual being a supplier, had acted in such a manner, the supplier shall be appropriately penalized, for example through blacklist, termination or legal suit.

1. **Reporting Procedure**
   1. Protasco Berhad has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisors or any of the superiors. If the employee is not comfortable speaking to their supervisors or any of the superiors, or is not satisfied with their response, the employee is encouraged to make a report via the Whistleblowing channels **(Refer to item no. 13).** The Whistleblower should fill up the Whistleblowing Report **(Refer to Appendix 1)** in order to be protected under the Policy. Evidences (if any) and accurate information must be provided during the disclosure (e.g.: the persons involved, nature of allegation, and the time and venue where the incident took place).
   2. The Reporting Individual needs to demonstrate that there are reasonable grounds for his concern and that the report is done in good faith and not for personal gains.
   3. The Whistleblower/Reporting Individual shall accept the decision on the outcome by the appointed representative of the Chairman Office. Any matters relating or in connection thereto are final and binding and no queries, appeals or correspondence will be entertained.
   4. If any further details are required from the Whistleblower to assist the investigation, the appointed representative of the Chairman Office may contact the Whistleblower, for which cooperation from the Whistleblower is compulsory, failing which, the complaints shall not be investigated further.
2. **Making a Report**
   1. **Written Disclosure**

The employee or the Reporting Individual is to fill up Appendix 1 and submit to the Chairman Office.

Information required when lodging a report:

* Particulars of the Reporting Individual to facilitate further investigation
* A description of the wrongdoing and the identity of Parties Involved
* Background of the wrongdoing that the Reporting Individual is reporting (the Details of the Report)
* Evidences or proofs that support the allegations made by the Reporting Individual.
* The impact of the wrongdoing to the Company.

1. **Communication**
   1. Information relating to any Report of Wrongdoing or Whistleblowing Report and any related investigation must be managed and restricted internally on a “need to know basis only”.
   2. Employees must always be reminded of the confidentiality clauses embodied in their employment contracts and the Group’s Human Resources Manual (HR Manual), where appropriate.
   3. In the event that the matter becomes public information or results in negative publicity and/or image, the appointed representative of the Chairman Office will work with the Group Corporate Communications to manage the situation.
2. **Dissemination and Awareness of this Policy**
   1. For the Whistleblowing mechanism in this Policy to be effective, there must be a proper dissemination and awareness of this Policy.
   2. It is the responsibility of appointed representative of the Chairman Office to coordinate and ensure effective dissemination and awareness of this Policy. The dissemination and awareness program may be assigned to relevant parties within the Group’s operations.
   3. This Policy shall be distributed via the following:
      1. The Group’s Portal
      2. E-mail to all e-mail users
      3. Incorporated in the induction program for new employees
   4. It is the joint responsibility of Group Human Resources and Heads of Divisions to ensure that the dissemination of this Whistleblowing Policy reach all levels of employees.
3. **Acting in Good Faith**

The Company expects all parties to act in good faith and have reasonable grounds when reporting the wrongdoings. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable

1. **Reverting to Complainant**

The Company reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owned to someone else.

1. **Whistleblowing Channels**

For the above purpose, the following channels should be used:

* Via e-mail to: [whistleblow@protasco.com.my](mailto:whistleblow@protasco.com.my)
* In writing to: Chairman Office

Protasco Berhad

2nd Floor, Corporate Block

Unipark Suria, Jalan Ikram-Uniten

Selangor Darul Ehsan

Tel: 03-87375302

Fax: 03-87348992

For the whistleblowing report form, kindly click here