



**SIN HENG CHAN (MALAYA) BERHAD**  
(Registration No.: 196201000185 (4690-V))

**Whistleblowing Policy and Procedures**



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### **1. POLICY STATEMENT**

Sin Heng Chan (Malaya) Berhad (“SHCMB” or “the Company”) is committed to achieving and maintaining high standards of integrity and accountability in regard to all aspects of its business and operations. All employees and stakeholders (i.e. shareholders/ suppliers/ customers) are encouraged to report genuine concerns about any wrongdoing without fear of reprisal should they act in good faith when reporting such concerns.

SHCMB views any harassment or retaliations in any form or manner against genuine whistleblowers seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.

This policy and procedures are applicable to all companies within SHCMB Group.

### **2. OBJECTIVES**

This policy aims to provide an avenue for all employees and stakeholders of the Group as well as members of the public to disclose any wrongdoing in accordance with the procedures under this Policy and to provide protection for those who report such allegations.

This policy is designed to provide the following:

- (i) Support to the Company’s commitment to integrity, accountability, and ethics in carrying out its business and operations.
- (ii) A clear and confidential process for all parties involved to provide information on any wrongdoing in relation to the Company’s Code of Ethics, Whistleblowing Policy, Anti-Bribery and Corruption Policy, or other applicable laws and regulations.
- (iii) A transparent and efficient framework to investigate the allegations and to take appropriate actions.

### **3. PRINCIPLES**

The principles underpinning the policy are as follows:

- All concerns raised will be treated in a fair and proper manner;
- The Company will not tolerate harassment or victimization of anyone raising a genuine concern;
- Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- The Company will ensure that any individual raising a concern is aware of who is handling the matter;
- The Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this assurance to those who maliciously raise allegations which he/she knows is untrue.



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#### **4. DEFINITIONS**

“**Confidential Information**” shall include but is not limited to the following:

- (i). Information on the identity, occupation, residential and work address or whereabouts of a whistleblower and a person against whom a whistleblower has made a disclosure of wrongdoing;
- (ii). Information disclosed by a whistleblower;
- (iii). Information that, if disclosed, may cause detriment to any person.

“**Whistleblowing**” means a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about any Wrongdoing that is taking place, has taken place, or may take place in the future.

“**Wrongdoing**” is any conduct which, if proved, constitutes a breach of the Company’s Code of Ethics, Anti-Bribery and Corruption Policy, company policies, and national regulations and laws. Wrongdoing includes, but is not limited to, the following:

- fraud
- misappropriation of assets
- sexual harassment
- criminal breach of trust
- corruption
- questionable or improper accounting
- misuse of confidential information
- breach of Group Policies and Authorities
- acts or omissions which are deemed to be against the interest of the SHCMB Group / Company, laws, regulations or public policies.

#### **5. LIMITATIONS**

Only genuine concerns should be reported under Whistleblowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct.

#### **6. CONFIDENTIALITY**

The identity of parties reporting a Whistleblowing complaint will be kept confidential. However, their consent will be sought should there be a need to disclose their identity for investigation purposes. Disclosure of their identity will be on a strict need-to-know basis to select senior management. The whistleblower shall be provided with the assurance that the outcome of the investigation will be provided to the whistleblower.



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## **7. PROTECTION**

The Company shall ensure that that, if the whistleblower is an employee of the Company, he/she shall be protected against any such reprisals or retaliation from the whistleblower's immediate supervisor or department head or any other person exercising authority over the whistleblower in his/her employment, provided that the whistleblower's complain is made in good faith and adheres to the guidelines above.

## **8. PROCEDURES**

8.1 Any concern should be raised with the immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the 'Group Managing Director'. The reporting channel to the Group Managing Director is as follows:

Name : Dato' Choo Keng Weng  
Email : kwchoo@shcm.com.my  
Telephone: +603 2094 7992  
Mail : **Mark Strictly Confidential**  
Sin Heng Chan (Malaya) Berhad  
Level 3, Wisma E & C  
No. 2, Lorong Dungun Kiri  
Damansara Heights,  
50490 Kuala Lumpur

8.2 In the case where reporting to the management is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name : Tunku Azlan Bin Tunku Aziz  
Email : auditcom@shcm.com.my  
Telephone : +603 2094 7992  
Mail : **Mark Strictly Confidential**  
Sin Heng Chan (Malaya) Berhad  
Level 3, Wisma E & C  
No. 2, Lorong Dungun Kiri  
Damansara Heights,  
50490 Kuala Lumpur  
Attention : Chairman – Audit Committee

8.3 Whistleblowers may fill in the Whistleblowing Form attached and send them to the relevant addresses above.

8.4 Upon completion of the whistleblowing process, the whistleblower will be notified of the outcome.



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## **9. WHISTLEBLOWING FRAMEWORK**

### **9.1 Investigation procedures**

Upon logging a report of wrongdoing, the Compliance Committee (CC) will provide the whistleblower an acknowledgement of receipt of the report of the wrongdoing within three (3) working days of receipt.

### **9.2 Conduct of investigation**

A preliminary investigation will be carried out upon receiving a whistleblowing report, with the following procedures as follows:

- in the event that the preliminary assessment clearly indicates that there are no circumstances that warrant any investigation, the case shall be closed.
- in the event that it is purely an enquiry that raises no elements of complaints, the case shall be redirected to the relevant department for further response.
- in the event that preliminary assessment indicates that it is a complaint relating to product and services, it shall be directed to the appropriate manager for resolution.
- in the event that preliminary assessment indicates that it is a complaint alleging wrongdoing/misconduct/grievances, an investigation will be carried out by the Compliance Committee/Group Managing Director/Audit Committee depending on the severity of the whistleblowing complaint and the channel by which the whistleblower submits the report.

### **9.3 Findings of investigation**

Upon the conclusion of an investigation, the investigation report shall be reviewed by the Head of the Compliance Committee (Head – CC).

- a) The Head – CC shall monitor the corrective actions to be taken to mitigate the risks of such wrongdoing recurring. If systemic weaknesses are identified, the Head – CC shall implement and monitor the rectification measures to strengthen the systemic processes within the Group. Depending on the outcome of investigation, the CC/Group Managing Director/Audit Committee shall take the most appropriate course of action in accordance with the Group's ABC Policy. Where applicable, the ABC Policy and subsequent methods of preventing unethical practices will be refined based on the knowledge gathered from any future incidents.



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- b) A final report together with the corrective actions undertaken by the CC (if any) shall be presented to the Group Managing Director, unless:
- A member of the CC is implicated – then the Group Managing Director will conduct the investigation and review the report alongside the Audit Committee.
  - The Group Managing Director is implicated – then the Audit Committee will conduct the investigation for an internal review.
  - A member of the Audit Committee is implicated – then they are subject to investigation by the MACC and/or any other regulatory authority.

**9.4 Decision of reporting**

- The CC/Group Managing Director/Audit Committee shall review the final report before deciding to concur in closing each case.
- The Head – CC/Group Managing Director/Audit Committee will inform the whistleblower that the investigation has been completed. As the findings are confidential, the details of the findings will not be disclosed to the Whistleblower.
- Findings of all whistleblowing cases shall be presented to the Board of Directors by the Head – CC bi-annually (if any).
- Closed cases shall be reported to external auditors yearly, as requested during external audit.

**10. ACTIONS**

- 10.1 All reports must be investigated promptly by the person receiving the report. If required, he/she can obtain assistance from other resources within the Group (e.g. Group Internal Audit, Group Human Resource Department, Group Legal Department etc.). The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting. Reports received anonymously will be treated as confidential.
- 10.2 Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decisions taken by the Audit Committee will be implemented immediately. Where possible, steps will also be implemented to prevent similar situation arising.
- 10.3 The whistleblower shall be notified of the outcome of the investigation.
- 10.4 If for any reason, the person making the report is not satisfied with the way his/her report had been dealt with, he/she can escalate the report to the Chairman of the Audit Committee. Channel of reporting to the Chairman of Audit Committee are:



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Name : Tunku Azlan Bin Tunku Aziz  
Email : auditcom@shcm.com.my  
Telephone : +603 2094 7992  
Mail : **Mark Strictly Confidential**  
Sin Heng Chan (Malaya) Berhad  
Level 3, Wisma E & C  
No. 2, Lorong Dungun Kiri  
Damansara Heights,  
50490 Kuala Lumpur  
Attention : Chairman – Audit Committee

- 10.5 The Chairman of Audit Committee will deliberate with the rest of the Audit Committee members and decide on the appropriate course of action.

The SHCMB Group would like to thank you in advance for bringing to our attention your concerns. Please be assured that your concerns will be investigated according to established procedures.

-----*End of Whistleblowing Policy and Procedures*-----

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## **WHISTLEBLOWING FORM**

Kindly provide the following details of any suspected wrongdoing, misconduct or any breach of law or regulation in relation to the operations of Sin Heng Chan (Malaya) Berhad. Please note that, if required, you may be called upon to assist in the investigation. All information herewith shall be treated confidentially in line with the Whistleblowing Policy of the Company.

### **A. Your Contact Information**

Name	
NRIC No	
Phone Number (mobile)	
Phone Number (office)	
Email Address	
<i>For employees only:</i>	
Department	
Position	

### **B. Details of Wrongdoing**

Kindly describe the wrongdoing with as many details as possible including the details of the persons involved, the allegation and the time of the wrongdoing.





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**C. Evidence**

Kindly detail any evidence to substantiate the allegations in order to facilitate our investigation. If possible, please attach the relevant supporting documents and information on other potential witnesses.

**D. Declaration**

I hereby declare that all the information provided herewith are made voluntarily and are true to the best of my knowledge. I will ensure that my participation in this matter will be kept confidential. I understand that the Company may use the information and material provided herein in order to facilitate the investigation.

\_\_\_\_\_  
Signature

Name :

Date :