



WHISTLEBLOWING PROCEDURE

First Issued & Approved by Board: 11 December 2019
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1. Introduction

- 1.1** SIDREC strives to conduct its business with honesty, integrity and professionalism. For this, it is important for SIDREC to be alerted of any actual or potential improper conduct by its senior management and staff, which compromises SIDREC's values and/or tarnish SIDREC's reputation.
- 1.2** Whistleblowing is defined as raising a concern of potentially serious impropriety to authorised persons of the wrongdoing in an organisation's officers. It is usually undertaken on the grounds of morality or conscience, or genuine concern over unethical behaviour being observed in an organisation.
- 1.3** Any individual who reports a misconduct that has occurred or a potential misconduct within an organisation is known as a whistleblower.
- 1.4** This procedure applies to all permanent and contract employees including interns, graduate management executives, secondees and employees on probation, as well as employees and agents of external contractors, suppliers and consultants doing work for SIDREC.
- 1.5** This procedure manual is meant to address any concerns raised in good faith and appropriate action will be taken against those who make malicious, vexatious and frivolous allegations.
- 1.6** For concerns raised in good faith, the organisation will take steps to protect the whistleblower from any discrimination or retaliation for raising the concern, such as denying award of contract, demoting, denying promotion, transferring, harassing and causing injury.

2. Report of improper conduct

- 2.1** A report may be made to SIDREC if it relates to a misconduct, committed or about to be committed in relation to the following areas:
- (i) Abused of position
 - (ii) Failure to comply with a legal duty
 - (iii) Commission of fraud, bribery and corruption
 - (iv) Disclosure of SIDREC's confidential or material information without proper authorisation
 - (v) Failure to meet professional standards
 - (vi) Involvement in any unlawful act
 - (vii) Unauthorised use of SIDREC's money, properties, facilities or other assets
 - (viii) Willfully exposing SIDREC's employees and property to risk thus affecting their safety and security
 - (ix) Breach of SIDREC's Vendor Code of Conduct by its vendors
 - (x) Any other violation of integrity that breaches SIDREC's Code of Conduct
 - (xi) Assisting a person to commit any of the above instances of misconduct
 - (xii) Any action taken against whistleblowers or persons closely associated with whistleblowers.

- 2.2** We encourage employees to raise genuine concerns that if left unattended or unreported, will have a damaging impact on SIDREC’s reputation.
- 2.3** This procedure is not for the purpose of channeling private grievances, including complaints about individuals or about employment matters. These types of concerns should be discussed first and foremost with your supervisor, Head of Department and/or SIDREC Chief Executive Officer (CEO).

3. Whistleblowing channel in SIDREC and required information

- 3.1** Any report of misconduct that concerns SIDREC must be made to any of the relevant Designated Person through the communication channels set out in the following table:

| Alleged wrongdoer | Designated Person | Email Address | Letter |
|---|---|---|---|
| SIDREC CEO | Chairman of SIDREC Board Resource Committee (BRC) | chairBRCwb@gmail.com | Delivered in a sealed envelope and clearly marked as “PRIVATE & CONFIDENTIAL” and addressed to: [Name of appropriate Designated Person] Securities Industry Dispute Resolution Center Unit A-9-1, Level 9, Tower A, Menara UOA Bangsar, No. 5, Jalan Bangsar Utama 1, 59000 Kuala Lumpur |
| Chairman of SIDREC Board of Directors | SC Chairman | <i>[to be confirmed by the SC]</i> | |
| Any other member of SIDREC’s Board of Directors | Chairman of SIDREC Board of Directors | chairBODwb@gmail.com | |
| Any other SIDREC staff | Chairman of BRC or SIDREC CEO | chairBRCwb@gmail.com or ceoSIDRECwb@gmail.com | |

- 3.2** Whistleblowers are advised to make their report in writing and to provide sufficient details which include, but not limited to, the following:
- (i) The type or description of improper conduct;
 - (ii) The name of individuals who have committed or are involved in the improper conduct; and
 - (iii) The ‘how’, ‘what’ and ‘where’ in relation to the improper conduct including supporting documents or evidence, if any.
- 3.3** Whistleblowers are encouraged to provide their identities and contact details to facilitate any clarification required for further investigation, if necessary. Whistleblowers are encouraged to complete SIDREC Whistleblowing Form which is enclosed in **Appendix 1** of this procedure manual.
- 3.4** Any person who wishes to remain anonymous is advised that no whistleblower protection will be accorded and SIDREC’s ability to investigate the alleged misconduct is limited to the extent of the contents of the report received by SIDREC.

4. Protection accorded to whistleblower

- 4.1** The identity of the whistleblower will be kept confidential and will only be disclosed to relevant persons on a strictly need to know basis for the sole purpose of acting on the report.
- 4.2** The whistleblower will be informed before his identity is revealed to any party outside the whistleblowing channel.
- 4.3** All reports, including anonymous ones, will be considered. They will be acknowledged, recorded and screened by the Designated Person of the whistleblowing channel. All forms and documents will be stamped as "CONFIDENTIAL" to protect its content from unauthorised use.
- 4.4** The Designated Person will take appropriate measures to ensure the whistleblower will be protected from retaliation for whistleblowing. The Designated Person will also take appropriate measures to manage the expectations of the whistleblower so that it is understood what can or cannot be done.
- 4.5** If the whistleblower reports an incident of harassment, discrimination or adverse treatment as a result of retaliation against whistleblowing, the Designated Person(s) of the whistleblowing channel will record details of the incident and with the whistleblower's permission, refer the matter to the appropriate authority.
- 4.6** SIDREC reserves the right to report illegal actions to the appropriate authorities, which may result in civil and criminal penalties.

5. Whistleblowing report review process

- 5.1** Once a whistleblowing report is received through the whistleblowing channel, it will be analysed to determine if there is sufficient information to proceed further and to ensure the report is genuine.
- 5.2** The Designated Person will decide on the next course of action depending on the nature of the concern. This may include setting up an independent investigation committee, in consultation with the appropriate authority (depending on the nature of improper conduct), to undertake an investigation of the concern raised.
- 5.3** If the whistleblower discloses his identity, he will be informed of the decision and the next course of action as soon as practicable.
- 5.4** **Appendix 2** of the procedure manual provides an illustration of SIDREC's whistleblowing process flow.

Appendix 1

Whistleblowing Form



WHISTLEBLOWING FORM

Note: This form may be used by a whistleblower to raise a concern on wrongdoing. This completed form must be submitted to any of the Designated Person(s) described in Section 3 of this procedure. The information provided will be kept confidential and will only be disclosed to relevant persons on a strictly need to know basis, with permission from the whistleblower.

PART A – TELL US ABOUT YOURSELF

Name: _____

Department/Company: _____ Job Level: _____

Designation: _____

Contact Details:

PART B – TELL US ABOUT YOUR CONCERN(S)

| Name of individual(s) involved | Department/Company |
|--------------------------------|--------------------|
| 1. _____ | _____ |
| 2. _____ | _____ |
| 3. _____ | _____ |

PART C – STATE YOUR CONCERN(S) HERE WITH AS MUCH DETAIL AS POSSIBLE. DESCRIBE THE EVENT THAT HAPPENED AND THE DATES ON WHICH THEY OCCURRED:

(Please continue on another sheet if there is insufficient space)

PART D – DO YOU HAVE ANY DOCUMENTS, LETTERS OR OTHER EVIDENCE IN SUPPORT OF YOUR CONCERN?

No

Yes, I will forward them to the Designated Person in due course

Yes, the following documents/evidence are attached with this form

1. _____

2. _____

3. _____

4. _____

5. _____

(Please continue on another sheet if there is insufficient space)

(Signature)

(Date)

Appendix 2

Whistleblowing Process Flow



