



WHISTLEBLOWING POLICY

EFFECTIVE DATE: 29 JULY 2020

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1.0 POLICY STATEMENT

Bond Pricing Agency Malaysia Sdn Bhd (BPAM) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognising the above-mentioned values, BPAM provides an avenue for all employees of BPAM and members of the public to disclose any improper conduct within BPAM.

2.0 OBJECTIVE OF THE POLICY

This Policy is to provide an avenue for all employees of BPAM and the members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees of BPAM and members of the public who report such allegations.

3.0 SCOPE OF THE POLICY

This Policy is designed to facilitate employees of BPAM and members of the public to disclose any improper conduct (misconduct or criminal offence) through the appropriate internal channels. Such misconduct or criminal offences include the following:

- Fraud
- Bribery
- Abuse of Power
- Conflict of Interest
- Theft or embezzlement
- Misuse of Company's Property
- Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under BPAM's Code of Business Conduct Policy or any criminal offence under relevant legislations in force.

4.0 APPLICABILITY OF THE POLICY

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of BPAM. This policy also applies to members of the public, where relevant.

5.0 PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee of BPAM who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within BPAM, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

6.0 RAISING A CONCERN / DISCLOSURE CHANNEL

- i. A disclosure of improper conduct may be made in writing via electronic e-mail to whistleblowing@bpam.com.my):-
- ii. The whistleblower must address the following aspects, while reporting any issues under this policy:
 - Clear understanding of the issue being raised.
 - The issue should not be merely speculative in nature but should be based on actual facts.
 - Should contain as much specific information as possible to allow proper inquiry/investigation.
 - If the whistleblower has a personal interest in the matter, he will be required to disclose this.

7.0 INVESTIGATION

- i. The Prescribed Officer who receives the report will assess the report to determine whether it is related to a Wrongdoing or excluded from the scope of this Policy and shall make general recommendations to the Board. The Board may designate any person, from the BPAM or an external party, to conduct any investigation or to carry out any other process pursuant to this Policy (for instance, any meeting or an internal audit).
- ii. The Board has the authority to make the final decisions including, but not limited to, any of the following:
 - Rejection of the report;
 - Directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
 - Resolution without recourse to an investigation;
 - Directing investigations on the report and any persons involved or implicated;
 - Suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact finding or to avoid any employee's exposure to threat or harm;
 - Obtaining any other assistance (for instance, external auditors or legal advice); and
 - Referral to the police or any other appropriate enforcement authority.
- iii. If the wrongdoing involves any member of the Board, the report shall be made to the Chairman of Board. The Chairman of Board shall then authorise a director to be responsible for the investigation and recommendation to the Board of Directors. If the wrongdoing involves the Chairman of Board, the report shall be made to the Chairman of the Audit Committee. The Chairman of the Audit Committee shall then be authorised to direct an investigation for a report to be made to the Malaysian Anti-Corruption Commission if required. If the wrongdoing involves the whole Board, the report shall be made to the Malaysian Anti-Corruption Commission. The prescribed personnel shall have the authority to make the final decisions regarding the disclosure of wrongdoing.
- iv. It is intended that the disclosures by the whistleblower will be acted upon in a timely manner.

8.0 ANONYMOUS WHISTLEBLOWER

Any anonymous disclosure will not be entertained. Any employee of BPAM or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

9.0 NOTIFICATION

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

BPAM reserves the right to amend this policy from time to time.