



**CORPORATE GOVERNANCE  
WHISTLEBLOWING POLICY**

## TABLE OF CONTENTS

<b>1 POLICY STATEMENT .....</b>	<b>3</b>
<b>2 OBJECTIVE OF THE POLICY .....</b>	<b>3</b>
<b>3 SCOPE OF THE POLICY.....</b>	<b>3</b>
<b>4 APPLICABILITY OF THE POLICY .....</b>	<b>4</b>
<b>5 WHISTLEBLOWING PROCEDURES.....</b>	<b>4</b>
<b>6 PROTECTION TO WHISTLEBLOWER.....</b>	<b>6</b>
<b>7 ANONYMOUS WHISTLEBLOWER .....</b>	<b>7</b>
<b>8 NOTIFICATION .....</b>	<b>6</b>

<b>CORPORATE GOVERNANCE</b>		<b>DEPT NAME: ALL</b>	
<b>Effective Date</b>	29 <sup>th</sup> June 2015 (Ver 000)	<b>Version No.</b>	004
<b>Revision Date</b>	20 July 2022	<b>Approval Date</b>	30 August 2022
<b>TITLE</b>	<b>WHISTLEBLOWING POLICY</b>		

## **1 POLICY STATEMENT**

Sedania Innovator Berhad (“the Company”) and its subsidiaries (“the Group”) are 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 abovementioned values, the Group provides avenue for all employees of the Group, customers and other stakeholders/persons providing services to the Group, including consultants, vendors, independent contractors, external agencies and/or any other party with a business relationship with the Group, to disclose any improper conduct within the Group through this policy.

## **2 OBJECTIVE OF THE POLICY**

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

## **3 SCOPE OF THE POLICY**

Anyone has the right to whistle blow. This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following (“Reportable Conduct”) :

- i Any conduct against the law or represents a failure by the Group to comply with any legal or regulatory obligations;
- ii unethical or in breach of the Group’s Code of Conduct or other policies;
- iii fraud, theft, embezzlement or dishonesty;
- iv corruption or bribery;
- v coercion, bullying, harassment, victimisation or discrimination;
- vi misleading or deceptive, including questionable accounting, financial reporting or auditing practices either by, or affecting, the Group;
- vii conduct that potentially damaging to the Group, the Group’s employees or business associates, including unsafe work practices, environmental damages, health risks, or wasting of the Group’s resources;
- viii conducts that are likely to cause financial loss to the Group, damage its reputation, or be otherwise detrimental to the Group;
- ix involving any other kind of serious impropriety; and
- x deliberate concealment of any of the above or related irregularities.

<b>CORPORATE GOVERNANCE</b>		<b>DEPT NAME: ALL</b>	
<b>Effective Date</b>	29 <sup>th</sup> June 2015 (Ver 000)	<b>Version No.</b>	004
<b>Revision Date</b>	20 July 2022	<b>Approval Date</b>	30 August 2022
<b>TITLE</b>	<b>WHISTLEBLOWING POLICY</b>		

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under the Group's Code of Conduct & Business Ethics ("CoBE") or any criminal offence under relevant legislations in force.

This policy is not to invalidate the grievance procedure and/or the disciplinary action process and procedures but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company. The given procedures as reflected here and CoBE shall be operative based on the purpose and objective of their existence.

#### **4 APPLICABILITY OF THE POLICY**

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

#### **5 WHISTLEBLOWING PROCEDURES**

##### **5.1. Making a report**

All Group employees and third-party business associates are required to promptly report all Reportable Conduct in good faith. Failure to do so can result in discipline, up to and including termination of employment or business relationship in the case of third parties.

5.1.1. Below is the list of authorised person / committee that will be responsible in handling, investigation and reviewing the report received by the Whistleblower :-

- a) Management of the Company;
- b) Group's Compliance Officer;
- c) Chief Executive Officer;
- d) Audit and Risk Management Committee; and
- e) Board of Directors'

5.1.2. The Group has instituted two formal reporting channels:

- a) Open-Door Discussion  
Employees are encouraged to raise any issues the next level of management directly with their immediate managers, or the Group's Compliance Officer, if an employee has reason to believe that his/her manager is involved or has a conflict of interest. Third parties can directly contact the appropriate business managers at the Group to lodge any report in relation to this Policy. The management in receipt of the report must document it through an open-door intake form, and lodge the intake form to the Group's

<b>CORPORATE GOVERNANCE</b>		<b>DEPT NAME: ALL</b>	
<b>Effective Date</b>	29 <sup>th</sup> June 2015 (Ver 000)	<b>Version No.</b>	004
<b>Revision Date</b>	20 July 2022	<b>Approval Date :</b>	30 August 2022
<b>TITLE</b>	<b>WHISTLEBLOWING POLICY</b>		

Compliance Officer which then will be forwarded to the Chief Executive Officer (“CEO”) and Audit and Risk Management Committee (“the Committee”) to review and further investigation, to maintain a centralised incident management database.

- b) E-mail  
Whistle-blowers may report any issues via the Group’s public whistleblowing email at [whistleblowing@sedaniainnovator.com](mailto:whistleblowing@sedaniainnovator.com)

**5.1.2** To facilitate an investigation into the alleged wrongdoing, where possible and applicable, the following information should be included when making a disclosure:

- a) Brief description of the misconduct;
- b) The date and location of the incidence;
- c) The identity of the wrongdoer;
- d) Particulars of witnesses, if any;
- e) Supporting evidence and/or documents;
- f) Other details deemed to be useful to facilitate screening and action to be carried out.

**5.1.3** Where possible, the whistleblower is encouraged to disclose his/her personal details to enable the relevant parties conducting the investigation to contact the Whistleblower for further information:

- a) Name; and
- b) Contact details - email address and/or telephone number.

## **5.2. Investigation**

5.2.1. Group’s Compliance Officer shall receive the report and is obliged to document it, including open-door discussions and E-mails. Group’s Compliance Office required to generate real time reports for the CEO and the Committee to review.

5.2.2. The Committee shall review the reports, if any, on a case to case basis, and maintain proper records of all actions taken as to each report. The Committee shall submit the tracking reports, and related review or investigation findings where applicable, to the Board of Directors (if any)

5.2.3. No employee or third party who suspects Reportable Conduct, and no personnel to whom such conduct is reported, should attempt to personally conduct investigations, interviews or interrogations relating to the Reportable Conduct.

5.2.4. The Committee has the full discretion to:

- a) appoint an investigation team, internal or external, to assist with the review/investigation;
- b) engage outside auditors, counsel or other professionals to assist with the review/investigation in any capacities; and

<b>CORPORATE GOVERNANCE</b>		<b>DEPT NAME: ALL</b>	
<b>Effective Date</b>	29 <sup>th</sup> June 2015 (Ver 000)	<b>Version No.</b>	004
<b>Revision Date</b>	20 July 2022	<b>Approval Date</b>	30 August 2022
<b>TITLE</b>	<b>WHISTLEBLOWING POLICY</b>		

c) take other measures to facilitate the review/investigation as appropriate.

5.2.5. In discharging its responsibilities, the Committee shall have, to the extent permitted by the Group's policies, applicable laws and regulations:

- a) the authority to make inquiries with employees and third parties, and have unrestricted access to pertinent documents and information;
- b) free and unrestricted access to all the Group's records and premises, whether owned or rented; and
- c) the authority to examine, copy, and/or remove, to the extent permitted by applicable laws and regulations, all or any portion of the contents of systems, computers, servers, drives, data, mobile devices, files, desks, cabinets, and other storage facilities, or other data or information, within the Group's custody or control, and where necessary without prior knowledge or consent of any individual who may use, have access to or custody of any such

5.2.6. Upon completion of investigation, appropriate course of action will be recommended to the CEO or ARMC for its deliberation. Decision taken by the CEO or ARMC shall be implemented immediately. Appropriate actions may include but not limited to, referring the case to Human Resource Department for disciplinary action such as written warning, suspension without pay, deferment, demotion, dismissal and/or any other punishment permitted by industrial law.

5.2.7. The Group reserves the right to refer any concerns or complaints/report to appropriate external regulatory authority if deem necessary.

## **6 PROTECTION TO WHISTLEBLOWER**

A whistleblower will be accorded with assistance and protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions (not limited to retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or including any direct or indirect use of authority to obstruct the whistleblower's rights to continue to perform his/her duties including making further disclosure) and from all acts of harassment, retaliation, victimization and recrimination for disclosing any improper conduct committed or about to be committed within the Group, 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.

<b>CORPORATE GOVERNANCE</b>		<b>DEPT NAME: ALL</b>	
<b>Effective Date</b>	29 <sup>th</sup> June 2015 (Ver 000)	<b>Version No.</b>	004
<b>Revision Date</b>	20 July 2022	<b>Approval Date</b>	30 August 2022
<b>TITLE</b>	<b>WHISTLEBLOWING POLICY</b>		

Information relating to the identity of the whistleblower, the reported conduct and the investigation process or results will not be disclosed or discussed with anyone other than those who have a legitimate need to know, or unless required by applicable law or regulation in order to protect the whistleblower, the integrity of the investigation, the reputations of persons suspected but subsequently found innocent of wrongful conduct, and to protect the Group from potential civil or criminal liability.

There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need-to-know basis (e.g., requirement to testify in court). If such a situation arises, the Group shall discuss and seek consent with the whistleblower first before proceeding with the case.

The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith.

## **7 ANONYMOUS WHISTLEBLOWER**

Any employee or member of the public who wishes to report improper conduct may also lodge the complaint/report anonymously to the given channels above. However, to prevent false malicious reporting and abuse of the reporting channel, whistleblowers are encouraged to identify themselves. Whistleblowers must provide contact information in their reports because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Nevertheless, Section 6 in regards to the protection to the whistleblower is not applicable for anonymous whistleblower and will not be able to receive any notification on the outcome as per Section 8 herein. However, the Company reserves its right to investigate into any anonymous disclosure with consideration given to the seriousness of the issue raised and the credibility of the concern.

## **8 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.