



DELEUM

DELEUM BERHAD
WHISTLEBLOWING POLICY AND
INVESTIGATION PROCEDURE

REV. NO: 5

APPROVED BY THE BOARD OF DIRECTORS ON
10 DECEMBER 2020

Verified by:

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WHISTLEBLOWING POLICY AND INVESTIGATION PROCEDURE

1. INTRODUCTION

In line with the commitment to promote transparency, accountability and ethics and to ensure high standards of corporate governance is being upheld in the workplace, the Board and Management of Deleum Berhad (the Company) and its subsidiaries (collectively “the Group”) encourages its employees and external parties to report suspected and/or known instances of wrongdoing involving the Group’s Board of Directors, employees and its assets in accordance with this Policy. This Policy and Investigation Procedure is applicable to the Board and all employees of the Group irrespective of the terms of their letters of appointment, contracts of employment, grades, job descriptions or length of service.

External parties shall include but not be limited to customers, suppliers, professional advisers and any other third party providing services to the Group.

Employees and any external party whistleblowing / reporting wrongdoing are hereinafter referred to as “Reporting Individual” (RI).

2. OBJECTIVES

The objective of this Policy and Investigation Procedure is to provide and facilitate a mechanism or process for the RI to report any wrongdoing and provide assurance of protection in accordance with the procedures in this Policy.

3. WRONGDOING

Any person may report a complaint if he is aware of any Wrongdoing including but not limited to the following:

- Fraud;
- Misappropriation of assets;
- Harassment;
- Criminal breach of trust;
- Illicit and corrupt practices;
- Questionable and improper accounting;
- Misuse of confidential information;
- Acts or omissions which are deemed to be against the interest of the Company, laws, regulations or public policies;
- Giving false or misleading information including suppression of any material facts or information;
- Danger to health and safety or to the environment;
- Breaches of Group policies; or
- Deliberate concealment of any of the above matter or other acts of Wrongdoing.

4. **CONFIDENTIALITY**

All reports or disclosures of the RI shall be kept confidential and shall only be revealed on a need-to-know basis or if required by law, the courts or authorities.

The identity and particulars of the RI shall be kept private and confidential unless he chooses to reveal his identity. In such event, written permission will be obtained from him or her before information is released.

5. **REPORTING IN GOOD FAITH AND ASSURANCE AGAINST REPRISAL AND/OR RETALIATION**

The Group provides assurance to the RI, where RI is a director / an employee, against any reprisal or retaliation for disclosing wrongdoing from his superior, manager or department head and also against disciplinary action, provided the report is in good faith.

The RI shall act in good faith and have reasonable grounds when making a report. The report should be accurate and factual and not made with malicious intent, based on office gossip or made for purposes of personal advantage or gain.

Appropriate action will be taken against the RI if his or her allegations are found to be frivolous, malicious or vexatious or if he or she has participated in the wrongdoing.

6. **REPORTING PROCEDURE**

6.1 The RI shall report any wrongdoing via one of the following channels:

- i. Email to whistle@deleum.com

The Senior Independent Director will have direct access to this e-mail.

- ii. Letters/documents/reports (in sealed envelope with labelled “STRICTLY PRIVATE AND CONFIDENTIAL TO BE OPENED BY THE ADDRESSEE ONLY”) to be addressed to:

Senior Independent Director
C/o Corporate Secretarial Department,
No. 2, Jalan Bangsar Utama 9,
Bangsar Utama,
59000 Kuala Lumpur.

6.2 If the RI, either from an internal or external source makes a report through a reporting procedure not currently spelt out in the procedure, which can be through a third party i.e. Senior Management who may be the Group Managing Director (GMD), Group Chief Financial Officer, Chief Executive Officer, Senior General Manager, General Manager or any other employee, then it is the responsibility of the third party to escalate the report to the right channel as mentioned under clause 6.4.

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- 6.3 The RI should reveal his or her identity when reporting the suspect and/or known instances of wrongdoings. However, if the RI wishes to remain anonymous and does not want to divulge their personal details, then the party receiving the report should ensure an accurate record of what is being reported and the RI's intention to be anonymous, is made known to the responsible parties undertaking the investigation.
- 6.4 Where a report is received whether via a letter or email, the Senior Independent Director with the Chairman of Board Risk Committee (BRC) shall evaluate whether there should be any investigation and if so, to forward the report to the IC comprising of -
- (i) In respect of a member of the Board of Directors, the Chairman of the Audit Committee (AC) and two (2) other members of the Board;
 - (ii) In respect of the Senior Independent Director and/or the Chairman of the BRC and/or Chairman of the AC, the Chairman of the Board and two (2) other Independent Directors of the Board; and
 - (iii) In respect of an employee of the Company, the Chairman of the AC and two (2) other members of the Management of the Company of a senior level than the person against whom the report is made.

[See the Whistleblowing Investigation Flow Chart in the Appendix]

- 6.5 In conducting the investigation, the IC shall, but not restricted to -
- (i) communicate, interview, meet and discuss with any of the employees of the Company and external parties;
 - (ii) have free and unrestricted access to all records and premises (whether owned or rented);
 - (iii) have the authority to examine, copy, and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities including from the personal computer or other related devices owned by the Company on the premises without prior knowledge or consent of any individual who may use or have custody of any such items or facilities if it is within the scope of their investigation; and
 - (iv) do any other things necessary for the expedient and conclusive investigation.
- 6.6 At the conclusion of the investigation, the IC shall decide either to dismiss the report or to take appropriate actions against the person against whom the report is made. Such decision shall be conveyed to the Board.
- 6.7 Then the Board/ GMD of the Company will determine the appropriate action to be taken.
- 6.8 After the IC has made a decision, the Human Resource Department / Company Secretary (or any other authorised party, as the case may be) shall inform the RI of the outcome of the investigation.

6.9 The Board at its sole discretion reserves the right to investigate any matters that is brought to its attention or is received by the Board.

7. **REPORTING AND RETENTION OF REPORTS AND INVESTIGATIONS**

The custodian of this policy and procedure shall maintain a log of all reports, tracking the receipt, investigation and resolution of these reports and shall prepare a periodic summary thereof for the Chairman of AC. The AC shall be updated as and when there are cases reported.

8. **REVISION**

This Policy may be reviewed and updated from time to time. Any revision or amendment to this Policy and Investigation Procedure will be subjected to the approval of the Board.



Whistleblowing Investigation Flow Chart

