



DELEUM

WHISTLEBLOWING POLICY & PROCEDURE

REV. NO: 6

APPROVED BY THE BOARD OF DIRECTORS ON 23 FEBRUARY 2022

Custodian: Corporate Compliance & Risk Department

1. **POLICY STATEMENT**

Deleum Berhad and its group of companies (collectively “Deleum” or “the Group”) is committed to promote integrity, transparency, accountability and ethical behaviour in conduct of its business and operations. At Deleum, we aspire to conduct our affairs in an ethical, responsible, and transparent manner, consistent with our corporate values. In line with our commitment, we provide a mechanism for our employees or members of the public to report wrongdoing or improper conduct within Deleum.

2. **OBJECTIVE**

The objective of this Policy & Procedure is to provide an avenue for all employees of Deleum, third parties employed or engaged by the Group, and members of the public to disclose any wrongdoing and provide assurance of protection in accordance with this Policy & Procedure.

At Deleum, we are committed to identify, deal with, and rectify any improper conduct that can potentially harm the Company including its employees and reputation. We want to embed a culture across the Group where wrongdoing is not tolerated and when reported, will be quickly and efficaciously addressed.

3. **SCOPE**

This Whistleblowing Policy & Procedure is applicable across the Group and not to invalidate the Grievance Policy and /or Conduct and Disciplinary Policy but to provide alternative means for employees and members of the public to raise a concern outside the normal reporting channels.

This policy & procedure is not applicable to personal grievances concerning an individual’s terms and conditions of employment, or other aspects of working relationship, complaints of bullying / disciplinary matters. Such complaints should be dealt under the existing Human Resource policies and procedures.

4. **TYPE OF WRONGDOING**

Any person may lodge a report if he/she is aware of any instances of improper conduct or wrongdoing, including but not limited to the following:

- Any form of financial crime, including 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 Deleum’s policies; or
- Deliberate concealment of any of the above matter or other acts of wrongdoing.

5. **CONFIDENTIALITY**

All reports or disclosures of the Whistleblower 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 Whistleblower shall be kept private and confidential unless he/she chooses to reveal his/her identity. In such event, written permission will be obtained from the Whistleblower before information is released.

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

The Whistleblower shall act in good faith and have reasonable grounds when making a protected disclosure. The disclosure should be accurate and factual and not being made with malicious intent, based on office gossip or made for the purposes of personal advantage or gain. Appropriate action will be taken against the Whistleblower if his/ her allegations are found to be frivolous, malicious or vexatious or if he/she has participated in the wrongdoing.

7. **PROTECTION TO WHISTLEBLOWER**

A Whistleblower will be accorded with the necessary protection against any detrimental actions or unfair treatment for disclosing any improper conduct committed or about to be committed within Deleum, 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.

The protection to the Whistleblower can be revoked under the following circumstances, among others:

- The Whistleblower participated in the improper conduct;
- The Whistleblower wilfully discloses a false statement;
- The disclosure is frivolous or vexation;
- The disclosure is made with malicious intent;
- The disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
- The Whistleblower commits an offence in the course of making the disclosure or providing further information.

A Whistleblower may seek protection from any other enforcement agencies and any Federal or State Government departments or other persons as the enforcement agency deems appropriate.

Any party that retaliates against the Whistleblower who has reported a wrongdoing in good faith may be subjected to appropriate action, up to and including legal action, where applicable.

8. REPORTING PROCEDURE

8.1 Whistleblower shall report any wrongdoing via one of the following channels:

- i. Email to whistle@deleum.com
The Whistleblowing Committee Chairman 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:

Whistleblowing Committee Chairman
C/o Corporate Secretarial Department,
No. 2, Jalan Bangsar Utama 9,
Bangsar Utama,
59000 Kuala Lumpur.

8.2 Disclosure should include the following details:

- Name, designation, current address and contact numbers
- Basis or reasons of his/her concerns
- Nature of wrongdoing
- Date and time
- Place of its occurrence
- The identity of the alleged wrongdoers
- Particulars of witnesses, if any
- Particulars/ documentary evidence.

(Refers to Appendix 2 – Whistleblowing Lodgement Form)

8.3 Any employee or member of the public who wishes to report improper conduct may remain anonymous. The Whistleblowing Committee reserves the right to evaluate whether should the Protected Disclosure warrant any investigation.

8.4 The Whistleblowing Committee Secretariat who is also custodian of this Policy & Procedure will act as the coordinator on behalf of the Whistleblowing Committee which include the safekeeping of the evidence until the completion of the investigation process.

9. NOTIFICATION OF INVESTIGATION OUTCOME

The Whistleblower will be accorded the privilege to be notified by the Whistleblowing Secretariat / custodian of this Policy & Procedure on the outcome of the disclosure upon the completion of the investigation procedures.

10. REPORTING AND RETENTION OF REPORTS AND INVESTIGATIONS

The Whistleblowing Committee Secretariat of this Policy & 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 BRC. The BRC shall be updated as and when there are cases reported.

11. REVISION

Deleum Berhad reserves the right to amend or modify this Policy & Procedure at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Whistleblowers unless the same is notified to the Whistleblowing Policy & Procedure in writing.

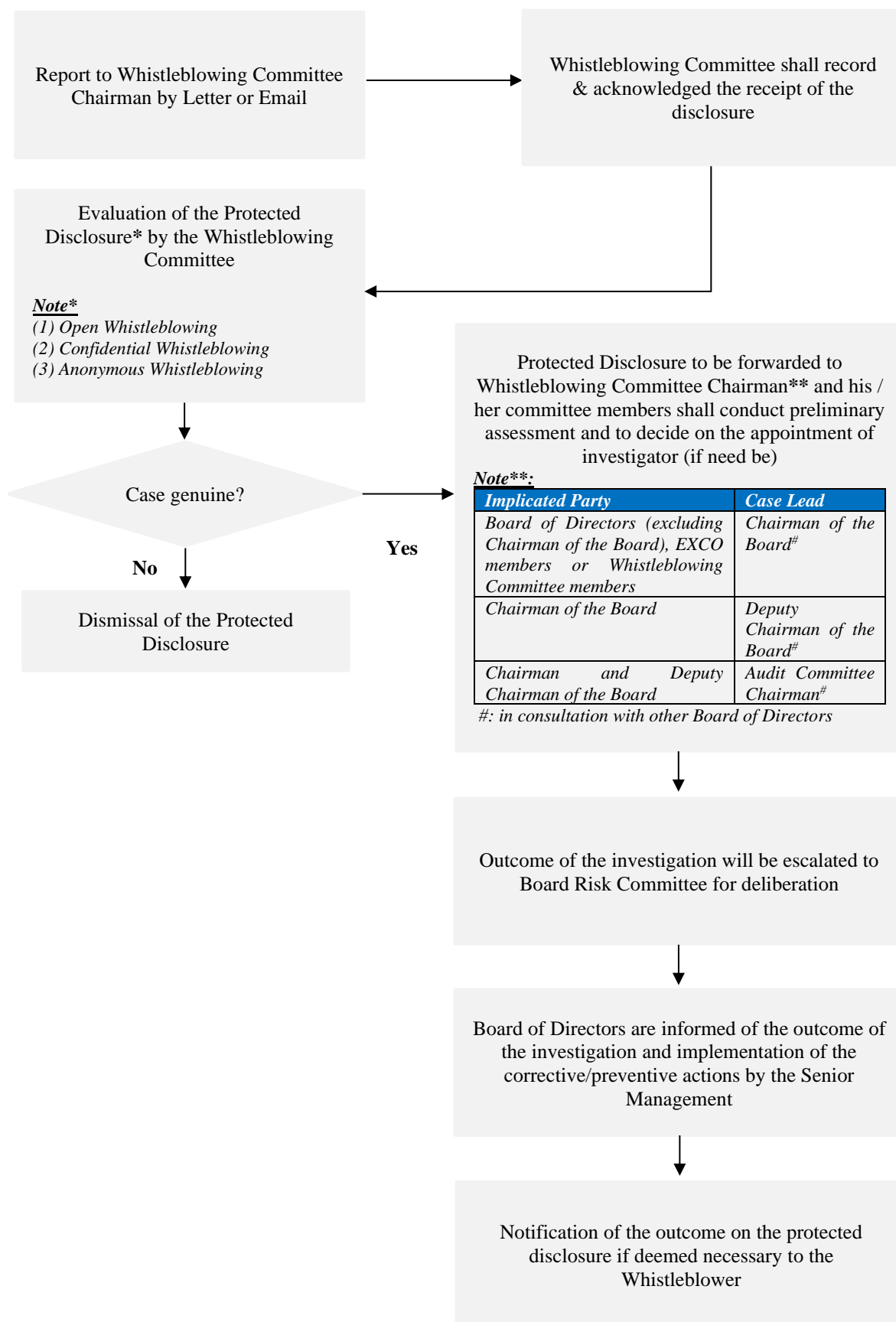
This document shall be published on Deleum Berhad's website for external parties and the public to be made aware of the Policy & Procedure and the available reporting channels to raise concerns with Deleum Berhad. Should there be any concern or inquiry in regard to the Policy & Procedure or the specific process, then those can be channelled to the custodian of this Policy & Procedure.

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

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Appendix A

Whistleblowing Procedures



Appendix B

Whistleblowing Lodgment Form

<i>Whistleblower Information</i>			
Name			
Contact Number		Email	
Company Name			
<i>Allegation Information</i>			
Name of Alleged Person			
Designation of Alleged Person		Department	
Company Name			
Incident Date		Incident Time	
Incident Location			
Type of Allegation	<input type="checkbox"/> Fraud / Corruption / Bribery <input type="checkbox"/> Mismanagement / Abuse of Power <input type="checkbox"/> Compliance Violations <input type="checkbox"/> Others (please specify)		
Allegation Details			
Estimated Value Involved (Amount)			
Other Parties Involved			
Preferred method of communication and details (Please choose at least one mode of communication)	<input type="checkbox"/> Phone: _____ <input type="checkbox"/> Email: _____		

Please attach this form in your email to whistle@deleum.com together with relevant supporting documents.