

## **CS05 WHISTLE-BLOWING POLICY AND PROCEDURES**

### **1. OBJECTIVES**

This policy sets out by which employees may, in confidence, raise concerns about possible misdemeanors that he/she is aware of at their respective delegated workplace and/or work responsibility.

### **2. REVIEW**

This policy is reviewed annually and updated in accordance with the needs of the Company.

### **3. INTRODUCTION**

All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

This Policy is designed to:

- (a) support the Company's values;
- (b) ensure employees can raise concerns without fear of reprisals; and
- (c) provide a transparent and confidential process for dealing with concerns.

This policy not only covers possible improprieties in matters of financial reporting, but also:

- (i) fraud;
- (ii) corruption, bribery or blackmail;
- (iii) criminal offences;
- (iv) failure to comply with a legal or regulatory obligation;
- (v) miscarriage of justice;
- (vi) endangerment of an individual's health and safety; and
- (vii) concealment of any or a combination of the above.

### **4. PRINCIPLES**

The principles underpinning this policy are as follows:

- (a) all concerns raised will be treated fairly and properly;
- (b) the Company will not tolerate harassment or victimisation of anyone raising a genuine concern;

- (c) any individual raising a concern is aware of who is handling the matter; and
- (d) the Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this assurance to someone who maliciously raise a matter he/she knows is untrue.

## 5. PROCEDURES

If any employee believes reasonably and in good faith that malpractice exists in the work place, the employee should raise with Head of Workgroup.

In the case where reporting to management is a concerned, then the report can be made to the Chairman of Audit Committee, supported by Corporate Services Workgroup ("CSW"). Channel of reporting to the Chairman of Audit Committee and CSW are as follows:

### Chairman of Audit Committee

Name: Lt. Jen. Dato' Seri Panglima Zaini b. Hj. Mohd Said SP (B)

Email: [zaini.mohdsaid@opcom.com.my](mailto:zaini.mohdsaid@opcom.com.my)

Tel: +603-5519 5599

### CSW

Name: Kasthuri Karpaiya

Email: [kasthuri.karpaiya@opcom.com.my](mailto:kasthuri.karpaiya@opcom.com.my)

Tel: +603-5519 5599

## 6. ACTIONS

The person receiving the report shall update the Chairman and Deputy Chief Executive Officer of the Company and investigate all reports promptly. The progress of investigation will be reported to the Audit Committee ("AC") no later than the immediate next scheduled AC meeting. All report received will be treated as confidential.

The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as law permits it or the person making the report indicates that he/she no longer wishes to remain anonymous.

Upon completion of investigation, appropriate course of action will be recommended to the AC for their deliberation. Decision taken by the AC will be implemented immediately, if, within AC's authority. AC shall report the caused and action taken to the Board in the next immediate scheduled meeting.

Matters beyond AC's authority shall be reported directly to Board for deliberation and decision making.

CSW is responsible to safe keep and maintain all reported documents.