



BINA DARULAMAN BERHAD

WHISTLE BLOWING POLICY

Date Revised & Approved:

11 MARCH 2018

Version No: (1) /2018

BINA DARULAMAN BERHAD: WHISTLE-BLOWING POLICY

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1. INTRODUCTION

- 1.1. BINA DARULAMAN BERHAD (“the Company” or “BDB”) is committed to upholding lawful and ethical behaviours in all its activities and requires its employees to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.
- 1.2. WHISTLE-BLOWING IS DEFINED as the action of an employee in disclosing evidence of wrongdoing including fraud, financial irregularity, circumventing internal policies and regulation arising from the deliberate commission of improper conduct and unethical activities.
- 1.3. By reporting via whistle-blowing channel, one alerts the organization to the fact that its stakeholders are being wrongfully harmed, or that they are at risk of harm.

2. PRINCIPLE

This Whistle-Blowing Policy is based on the Company’s values and principles of integrity, honesty, accountability, responsibility and corporate social responsibility.

3. PURPOSE

- 3.1. This policy aims to provide employees of the Company with an avenue to raise genuine concerns, report misconduct that is detrimental to the Company while provide assurance that will be protected from reprisals or victimization for whistle-blowing.
- 3.2. This policy is mainly to:
 - a. Support the Company’s commitment for good corporate governance and practices;
 - b. Ensure employees can raise genuine concerns without fear of suffering retribution; and
 - c. Provide a transparent process for dealing with concerns.

4. SCOPE

The Company encourages all genuine report of grave concerns with adverse impact on the Company, focusing on the following categories:

a. Illegal or unlawful conduct

Conduct may be illegal or unlawful in terms of the laws of Malaysia and international law such as theft, fraud, corruption, bribery, insider trading or blackmail and therefore constitute reportable misconduct.

b. Un-procedural conduct

Conduct may be un-procedural if it violates clearly communicated procedures (in the form of policies, regulations or rules) governing the operations. For examples: non-factual or misleading disclosure such as financial reporting, failure to comply with legal

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or regulatory obligations, circumvent or not following approved accounting practices and internal control guidelines and related matters.

c. Unethical conduct

Conduct may be unethical if it undermines the Company's core ethical values, such as integrity, respect, honesty, responsibility, accountability, fairness or activities that are not in line with the Company's value and policy for example sexual harassment and engaging in activities that are endangering the health or safety of fellow employees.

d. Wasteful conduct

Conduct may be wasteful if available resources are used in a wasteful manner that would result in significant adverse impact or material financial loss to Company.

5. OPERATION & RESPONSIBILITIES

5.1. Whistle-blowing report and cases will be handled based on the followings:

a. Confidentiality

Reports of concerns and investigations pertaining thereto shall be kept confidential to the extent possible. Unauthorised disclosure of information will be viewed as a serious disciplinary offense.

b. Anonymous reporting

Anonymous reporting will be attended and given due attention should individual making disclosure(s) opt to retain his/her anonymity.

c. Acting in good faith

Anyone reporting a concern must act in good faith and have reasonable grounds for whistle blowing. The act of making allegation that prove to be unsubstantiated, and that prove to have been maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in disciplinary action taken against them.

d. Fairness

All concerns raised will be treated fairly and properly. The Company will not tolerate the harassment or victimisation of anyone raising a genuine concern. The Company will also ensure that adequate and proper investigation be conducted prior to making conclusion on particular case or issue. The result of investigation will be escalated to relevant authority for deliberation and decision.

5.2. Notwithstanding the provisions of this Policy, a Whistleblower is at liberty to report any wrongdoing or improper conduct directly to any enforcement agency that he/she chooses such as the Malaysian Anti-Corruption Commission, the Securities Commission or the Police.

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6. COMMUNICATION

- 6.1. To ensure transparency and smooth operationalisation of this policy and integrity of the whistle-blowing framework, this policy and its supporting processes shall be circulated internally and be made readily available to all employees and authorised personnel, where applicable.
- 6.2. Policy will be reviewed from time to time to ensure its relevance and practicality, all updates and revision will be circulated to all employees and authorised personnel, where applicable.

7. APPENDICES

- (A) **INTERNAL PROCEDURES & PROCESS FOR MANAGING WHISTLE BLOWING REPORT**
- (B) **REPORTING CHANNEL / STRUCTURES**
- (C) **WHISTLEBLOWER'S FORMS**