



Tune Protect Group Berhad

(Registration No.: 201101020320 (948454-K))

Group Whistleblowing Policy

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1.0 Purpose

This Group Whistleblowing Policy is based on **the Trust, Impartiality and Protection (T.I.P.)** that provides the foundation for us to **receive, assess, address and conclude** investigations. This Principle was adopted from the ISO37002:2021 Whistleblowing Management System Framework for benchmarking purposes. This policy aims to achieve the following objectives:

- i. To encourage personnel, consultants, agents, interns, contractors, vendors, business partners, joint venture partners and other third parties / stakeholders to observe **ZERO TOLERANCE AGAINST BRIBERY AND CORRUPTION** by reporting all perceived and / or actual unethical or illegal conduct of directors, employees, management and other stakeholders across the Group in a confidential manner via the Tune Protect Whistleblowing channel provided herein, without any fear of harassment, intimidation or reprisal by anyone for raising concern(s) under this policy.
- ii. To protect individuals who report, in good faith, any improper, unethical or illegal conduct including bribery, corruption, fraud, money laundering, abuse of power and misconduct on a confidential basis.
- iii. To provide assurance that all disclosures will be appropriately investigated objectively and confidentially.
- iv. To provide a consistent, systematic, corporate-wide process for managing any suspected improper, unethical or illegal conduct including bribery, corruption, fraud, money laundering, abuse of power and misconduct.
- v. To help promote and develop a culture of openness, accountability and integrity.

2.0 Scope

This Policy applies to all directors, personnel, and other third parties / stakeholders of the Tune Protect Group, consisting of the Tune Protect Group Berhad, Tune Insurance Malaysia Berhad, Tune Protect Re Limited, White Label Sdn Bhd, Tune Protect Ventures Sdn Bhd, Tune Protect Thailand (Tune Insurance Public Company Limited) and Tune Protect EMEA (Tune Protect Commercial Brokerage LLC) (collectively referred to as the **"Tune Protect Group"**) and third parties dealing with the Tune Protect Group and should be used if you have a concern (perceived and / or actual) about bribery, corruption, fraud, money laundering, abuse of power and misconduct within Tune Protect Group in the following areas:

- i. Improprieties in matters of financial reporting (e.g., falsification or destruction of business / financial records; misrepresentation / suppression of financial information; non-adherence to internal financial reporting policy / controls including management overrides; and auditor independence concerns).
- ii. Suspected fraudulent activity (e.g., theft; defalcation; unlawful or improper payments).
- iii. Conduct or activity that breaches any of the following:
 - Tune Protect Group Anti-Bribery & Corruption Policy
 - Tune Protect Group Sustainability Policy
 - Tune Protect Group Whistleblowing Policy
 - Tune Protect Code of Conduct & the List of Misconduct
 - Tune Protect Code of Business Conduct for 3rd Parties

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- Malaysian Anti-Corruption Commission Act (MACC) 2009
 - Whistleblowers Protection Act 2010 (Act 711)
 - Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Act 2001 (AMLATFPUAA)
 - United Nations Convention Against Corruption Provisions
 - All other applicable laws in Malaysia, Thailand, United Arab Emirates and other relevant jurisdictions that apply.
- iv. Breach of the company's policies, procedures, practices or other rules of conduct (e.g., corrupt practice of giving or receiving bribes or improper benefits; abuse of authority; breach of client's confidentiality or privacy; conflict of interest concerns; other violations of governing laws and regulations; and non-adherence to internal compliance policies).
 - v. Deliberate concealment of information tending to show malpractice or misconduct in any of the above.
 - vi. Retaliation or reprisal against an employee / third party who reports a concern (e.g., statements, conduct or actions involving discharging, demoting, suspending, harassing or discriminating against an individual reporting a concern in good faith in accordance with the Guidelines).

The scope of the Guidelines does not include grievances or complaints in relation to normal work-related issues for which specific procedures have been established.

3.0 Definition

Abbreviation	Meaning
Code of Conduct	Tune Protect Group's Code of Conduct
Personnel	Anyone engaged by or associated with Tune Protect Group and includes all permanent interns, agents or contracted staff (whether full-time or part-time).
Whistleblowing	Deliberate, voluntary disclosure or reporting of an individual or organizational malpractice by any person (who has privileged access to information) on actual (past or present) or suspected improper conduct within the Group or organization based on his or her reasonable belief.
Whistleblower	Person who reports/alerts the serious concerns of improper conduct.
Third Party	Agents, consultants, contractors, customers, interns, investors, suppliers, shareholders, vendors and other business partners which have direct or indirect business dealings with the Tune Protect Group.
Improper Conduct	Unethical behaviour, malpractice, illegal acts or any other wrongful or improper conduct within Tune Protect Group which if proved, constitutes a disciplinary offence or a criminal offence. This includes, without limitation, any actual, attempted, or suspected bribery, corruption, fraud, money laundering,

Abbreviation	Meaning
	abuse of power, misconduct or non-compliance with applicable laws, the ABC policy documents, and all the Associated Documents listed in 2.0 and 12.0.

4.0 Responsibilities

Party	Responsibilities
i. Board of Directors (BOD), Executive Committee (ExCom) and all personnel	ii. The BOD, ExCom and all personnel shall be familiar with this policy in order to safeguard Tune Protect Group against bribery, corruption, fraud, money laundering, abuse of power and misconduct. iii. The BOD, ExCom and all personnel shall report any concerns or allegations. iv. The BOD also assesses risk from all aspects and provides valuable directives / guidance to minimize / mitigate risk.
ii. Risk Management Committee (RMC)	The Risk Management Committee (RMC), led by RMC Chairman, is the primary committee that convenes during quarterly board meetings, and whenever necessary, to assess, review, approve, disapprove and/or make recommendations for bribery and corruption related reports, updates and matter presented, including all matters relating to Whistleblowing.
iii. Risk Management Committee Chairman	The RMC Chairman will be the first to receive all Whistleblowing Complaints. i. To communicate with the WBIT about the report received. ii. To oversee the investigation of complaints. iii. To update the Tune Protect Group's Board of Directors on all reports received, the course of action taken and the outcome reached.
iv. Whistleblowing Committee	Pursuant to the T.I.P. Principles of "Trust, Integrity and Protection", the Whistleblowing Committee (WBC) shall be invited to convene on an ad hoc basis in the event a Whistleblowing Complaint is made against a member of the Board of Directors and / or RMC and / or ExCom for any the following: i. Complaints/reports against an apparent conflict of interest ii. Complaints/reports against an apparent act of bribery, corruption, fraud, money laundering, abuse of power, misconduct or any other offences committed against relevant laws, Tune Protect Group policies, codes, rules and regulations.

Party	Responsibilities
	<p>Upon identifying that there is a need for further investigation into the matter raised, the unaffected members of the WBIT and / or the Integrity Lead shall call for an Extraordinary Meeting involving the BOD and / or ExCom to discuss the matter and invite the WBC to preside.</p> <p>The presiding WBC shall NOT include members of the Board of Directors and / or / RMC and / or ExCom who are implicated in the relevant complaint.</p> <p>The WBC comprises members of the Board of Directors and ExCom described below:</p> <ul style="list-style-type: none"> i. Three (3) Tune Protect Group Directors AND ii. Three (3) members of the ExCom namely: iii. Group CEO / CEO iv. Chief Risk & Compliance Officer v. Chief People & Culture vi. In the event the Group CEO / CEO and / or Chief Risk & Compliance Officer and / or Chief – People & Culture are implicated in the same Whistleblowing Complaint, then up to three (3) other members of the ExCom shall be invited to sit on the WBC. <p>The six (6) member WBC shall convene to discuss the Whistleblowing Report received and decide on the following:</p> <ul style="list-style-type: none"> i. The composition and setting up of the interim RMC if any of the RMC directors are implicated. ii. The Next Steps direction for the WBIT pursuant to the T.I.P. Principles to “Receive, Assess, Address and Conclude” the matter satisfactorily.
v. Whistleblowing Investigation Team (WBIT)	<p>The (WBIT) reports to the RMC and the following are its permanent members:</p> <ul style="list-style-type: none"> i. Chief Risk & Compliance Officer ii. Integrity Lead <p>In the event a WBIT investigator needs to exclude himself / herself from the investigation process because of a potential / actual conflict, the WBIT reserves the option to invite a suitable C-Suite member or</p>

Party	Responsibilities
	<p>any other personnel relevant with the requisite expertise and / or experience to stand in as a WBIT investigator temporarily.</p> <p>All Whistleblowing investigations are to be conducted by the WBIT internally to safeguard the confidential nature of this channel.</p> <p>The WBIT has the following responsibilities:</p> <ol style="list-style-type: none"> To investigate into reports received with the highest standards of integrity and confidentiality. To invite other parties with the requisite experience / expertise to assist as WBIT investigations on a need basis. To interview witnesses and concerned parties during the fact-finding exercise. To record all facts and interviews. To report findings to the RMC and the Group CEO / CEO with recommendations and / or an Action Plan. To oversee closing matters amicably to all parties' satisfaction, where possible, within a reasonable time frame.
vi. Chief Risk & Compliance Officer (CRCO)	<ol style="list-style-type: none"> The CRCO leads and oversees the overall function of the WBIT application of the Group Whistleblowing Policy. The CRCO is also a permanent member of the Whistleblowing Committee.
vii. Whistleblower	<ol style="list-style-type: none"> The Whistleblower makes the report in good faith based on perceived and / actual facts, direct evidence, documentary and reliable witness statements and NOT on hearsay. He/she needs to provide all relevant information to facilitate an investigation. The Whistleblower shares the equal responsibility to maintain the highest level of integrity and confidentiality in all efforts to protect himself / herself from unwarranted repercussions, retaliation and vengeance. The requirement for confidentiality also works to protect Tune Protect Group from all negative social media attention, bad press and unnecessary public scrutiny / criticism that may be caused by a Whistleblower who does not observe sharing equal responsibility to keep matters confidential.

Party	Responsibilities
viii. Integrity Lead	<p>The Integrity Lead is the custodian of the Whistleblowing Policy who actively attend to the following:</p> <ul style="list-style-type: none"> i. Applying, enforcing and updating the policy on a needs basis. ii. Creating awareness about the reporting channel. iii. Updates the RMC, the Group CEO / CEO and the WBIT on all Whistleblowing matters, including with recommendations and progress of any Action Plans that may involve other parties. iv. Maintaining the Whistleblowing Register. v. He is also a permanent member of the WBIT.

5.0 Policy Statement

Tune Protect Group is committed to the highest standards of ethical, moral and legal business conduct and practices in all aspects of its business. In line with the above commitment, this Policy is established to encourage and to facilitate the disclosure of Improper Conduct and to protect persons acting in good faith when making disclosure of Improper Conduct.

6.0 How to Make a Whistleblowing Complaint

All personnel, third parties / stakeholders, shall, in good faith, report their concern on perceived and / or actual acts of bribery, corruption, fraud, money laundering, abuse of power, misconduct, based on facts, direct evidence, documentary evidence, reliable witness statements but NOT on hearsay, at the earliest opportunity so that corrective action can be taken as soon as possible. Employees and third parties / stakeholders have the option to make Whistleblowing Complaints in strict confidence by email to the following official email address for all entities in the group (Tune Protect Group Berhad, Tune Protect Insurance Malaysia, Tune Protect Re Ltd, White Label Sdn. Bhd. Tune Protect Ventures Sdn Bhd, Tune Protect Thailand (Tune Insurance Public Company Limited) and Tune Protect EMEIA (Tune Protect Commercial Brokerage LLC):

whistleblowing@tuneprotect.com

The person making a Whistleblowing Complaint needs to complete the Whistleblowing Complaint Form which can be found in **Appendix 1** and send it via e-mail as above.

A Whistleblowing Complaint may be made on an anonymous basis. However, insufficient details in the Whistleblowing Complaint may impede the investigation and resolution of the concerns.

7.0 Investigation of Whistleblowing Complaint**7.1 Preliminary Analysis and Investigation**

- i. Upon receipt of a complaint from the RMC Chairman, the WBIT shall conduct a preliminary review of the information provided to determine whether the legitimacy of the complaint and if it warrants further investigation. The WBIT shall assess the sensitivity and potential materiality of the complaint, as well as whether it alleges Accounting Allegation, violations of law, violations of policy or other misconduct.
- ii. Based on the preliminary analysis and recommendation provided by the WBIT, it may:
 - Close the Whistleblower's case file if the preliminary review conducted indicates that the complaint / report has no basis or merit or if it is not a matter to be dealt with under this Policy, in which case it will be redirected to the appropriate department/channel where applicable.
 - Initiate a more detail investigation and requests / recommends that the Chair of the WBC may convene to Board appoint additional investigator(s) to join the WBIT in the event the relevant expertise / experience is required OR in the event a to the RMC and/or WBIT has to be excluded from the investigations because any potential / actual conflict-of-interest and / or if implicated in the report personally.
- iii. The appointed investigator (either internal or external) shall outline the terms of reference and detailed procedures for the investigation. The investigator shall have the right to call for any information or documents and to examine any employee of the Tune Protect Group or any other person(s) as it may deem appropriate for the purposes of conducting its investigation of the complaint.
- iv. All allegations shall be investigated, and appropriate corrective action shall be recommended to the Group CEO / CEO and other relevant ExCom member(s), where applicable, prior to updating the RMC on the corrective action decided upon and/or taken.
- v. Complaints, investigations and the identity of complainants shall be kept confidential to the extent possible, consistent with the need to conduct a proper investigation. The WBIT may consult with any staff member whom they believe has expertise or information to assist in the investigation. The investigator shall periodically report on the investigation to the Group CEO / CEO, the RMC Chairman and Chairman of the Board, except to the extent that such individuals are the subject of the investigation.

7.2 Resolution of the Complaint and Reporting to the Board

The Integrity Lead / WBIT shall present their findings and recommendations to the RMC, which shall determine whether to adopt them, including any corrective action plan. If determined appropriate, the RMC may request (as appropriate) the WBIT to provide a summarized result of the investigation to the complainant (if known). The WBIT shall report periodically (or earlier upon request) to the RMC on the implementation of the corrective action plan until fully implemented.

7.3 Recordkeeping

- i. Upon completion of any investigation, the Integrity Lead shall provide all records to be maintained and shall maintain the records of the matter as confidential.
- ii. Please refer to **Appendix 2** for a summary of the procedures.

8.0 Confidentiality and Safeguards

All Whistleblowing Complaints will be treated as confidential to the extent reasonably practicable. This Group Whistleblowing Policy offers protection within the limits of the law and to the extent reasonably practicable to the person who submits the Whistleblowing Complaints in good faith, even if the allegations prove to be unfounded or mistaken.

9.0 Dissemination and Awareness of this policy

For the Whistleblowing mechanism in this Policy to be effective, there must be proper dissemination and awareness of this Policy. It is the responsibility of the Integrity Lead to ensure effective dissemination of this Policy. To reinforce employee's commitment to this policy, the Integrity Lead will periodically conduct an awareness training program to all relevant parties within the Group. This Policy shall be distributed via the following channels:

- i. Tune Protect Group's website
- ii. Email to all employees
- iii. Tune Protect Library
- iv. Publication of messages on Tune Protect's Workplace
- v. Incorporated in the induction and onboarding program for new employees
- vi. Refresher programs in conjunction with the Code of Conduct training for existing employees

It is the joint responsibility of the Integrity Lead and Heads of Departments to ensure timely dissemination within their respective department/team and for all employees to acknowledge conformance to the Group Whistleblowing Policy.

10.0 General Information about Whistleblowing and Whistleblower Protection

- i. Whistleblowing is a specific means by which a Whistleblower can report or disclose through established channels, his concerns in respect of Improper Conduct.
- ii. Only genuine concerns of a serious or sensitive nature should be reported under the whistleblowing procedures stipulated in this policy. This policy is not intended for petty, trivial or frivolous complaints nor is it intended for complaints which are dealt with vide procedures which are currently put in place for grievances. The complaint should be made in good faith with a reasonable belief that the information relating to the same is substantially true. The complaint shall not be made for personal gain. A complaint can be made even if the Whistleblower is not able to identify a particular person to which the Improper Conduct relates.

- iii. All confidential information obtained from the Whistleblower in connection with the complaint and the ensuing investigation will not be disclosed to any third party without the prior consent of the Whistleblower, to the extent permitted by law or required for purposes of making a report to the relevant authorities.
- iv. No reprisal action will be taken by Tune Protect Group against a Whistleblower in respect of any complaint made in good faith. However, if the complaint made is made with malicious intent or in bad faith by the Whistleblower, this will be viewed seriously by Tune Protect Group and will be treated as misconduct which may subject the Whistleblower to disciplinary action in accordance with Tune Protect Group's rules, policies and procedures.
- v. A person against whom a complaint is made shall not commit, threaten to commit and / or incite any person to commit / threaten to commit any improper conduct against the Whistleblower.
- vi. The protection accorded to a Whistleblower is not limited or affected in the event that a complaint or report made by the Whistleblower in good faith does not lead to any corrective action taken against the person(s) against whom the complaint has been made.
- vii. Remedies to the Whistleblower or any employee(s) affected by the improper conduct (if any) may include:-
 - Reinstatement of the Whistleblower or the employee(s) to the same position or to an equivalent position;
 - Compensation for lost wages, remuneration or any other benefits; and/or
 - Any other remedy deemed appropriate by the Group CEO / CEO and RMC.
- viii. Any other remedy deemed appropriate by the Group CEO / CEO and RMC. Pursuant to the Whistleblower Protection Act 2010, no action will be taken against the Whistleblower making a complaint in good faith, including:
 - Dismissing or threatening to dismiss the Whistleblower
 - Taking disciplinary actions, suspending, or threatening to discipline or suspend the Whistleblower.
 - Subjecting the Whistleblower to any form of harassment or abuse
 - Imposing any penalty, directly or indirectly, on the Whistleblower
 - Discharging, demoting, suspending, threatening, harassing or in any manner discriminating against the Whistleblower.

11.0 Associated Documents/Reference

The Group Whistleblowing Policy shall be read together with the following:

- i. Tune Protect Group Anti-Bribery & Corruption Policy
- ii. Tune Protect Group Sustainability Policy
- iii. Tune Protect Group Whistleblowing Policy
- iv. Tune Protect Code of Conduct & the List of Misconduct
- v. Tune Protect Code of Business Conduct for 3rd Parties
- vi. Malaysian Anti-Corruption Commission Act 2009
- vii. Whistleblowers Protection Act 2010 (Act 711)
- viii. Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Act 2001 (AMLATFPUAA)
- ix. United Nations Convention Against Corruption Provisions
- x. All other applicable laws in Malaysia, Thailand, United Arab Emirates and other relevant jurisdictions that apply.

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Appendix 1**WHISTLEBLOWER COMPLAINT FORM**

Thank you for reaching us at the official Tune Protect Whistleblowing channel. This is a confidential reporting platform for anyone who wants to report any perceived / actual act of bribery, corruption, fraud, money laundering, abuse of power, misconduct or improper activity.

As confidentiality is a shared responsibility that Tune Protect commits to observing with you, we ask for you to do the same and refrain from discussing the matter openly and publicly that may attract social and media attention or any other attention that may prejudice any effort to investigate into the matter confidentially.

Please make your report in good faith, based on facts, direct / documentary evidence and reliable witness testimony that will be important with the investigation into the matter. Please do NOT provide hearsay evidence that will be very difficult to verify.

Please provide the following details for any suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

Please refer to the Group Whistleblowing Policy for further information:

Briefly describe the act of bribery, corruption, fraud, money laundering, abuse of power, misconduct and / or improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.
1. What act of bribery, corruption, fraud, money laundering, abuse of power, misconduct and / or improper activity allegedly occurred?
2. Who (including individuals who colluded to) committed the alleged act of bribery, corruption, fraud, money laundering, abuse of power, misconduct and/or improper activity?
3. When and how did you discover it?
4. Where and when did the alleged incident occur?

5. Are there any other external parties involved other than the suspect stated above?

6. Do you have any other details, evidence or supporting information which would assist us in the investigation?

7. Do you like to be notified of the investigation outcome? Do you have any suggestions to improve the whistleblowing process?

WHISTLEBLOWER'S CONTACT INFORMATION

(This section may be left black if the Whistleblower wishes to remain anonymous)

NAME

DESIGNATION

DEPARTMENT/AGENCY

CONTACT NUMBER

EMAIL ADDRESS

SUSPECT'S INFORMATION

NAME

DESIGNATION
DEPARTMENT/AGENCY
CONTACT NUMBER
EMAIL ADDRESS
WITNESS' INFORMATION (if any)
NAME
DESIGNATION
DEPARTMENT/AGENCY
CONTACT NUMBER
EMAIL ADDRESS
REPORT DATE

Appendix 2

WB Policy: Whistleblowing Investigation, Reporting Procedure and Timeline for Complaints Received via Email**1st Working Day**

- The TPG Risk Management Committee (RMC) Chairman receives the Whistleblowing Complaint emailed by the Whistleblower to the Tune Protect Whistleblowing email address at whistleblowing@tuneprotect.com.
- The system simultaneously notifies the Whistleblowing Investigation Team (i.e., WBIT, which consist of the Chief Risk & Compliance and Integrity Lead) that the TPG RMC Chairman has been sent an email via the Whistleblowing Channel.

**2nd Working Day**

- The WBIT shall email the TPG RMC Chairman and the Group CEO / CEO about the notification received about a Whistleblowing Complaint that was emailed to the TPG RMC Chairman.
- The TPG RMC Chairman responds by emailing the Whistleblowing Complaint to the TPM RMC Chairman, if relevant, and to the W B I T . The WBIT is required to actively follow-up with the TPG RMC Chairman and request for the Whistleblowing Complaint.

**3rd Working Day**

- Upon receiving the Whistleblowing Complaint from the TPG RMC Chairman, the WBIT assesses whether to refer the matter to the TPM RMC Chairman, investigate, recommend Next Steps or if the is No Further Action Required.
 - ✓ If there is No Further Action Required, the WBIT shall update the Group CEO / CEO / RMC Chairman for concurrence.
 - ✓ If the Group CEO / CEO / RMC Chairman agree that there is No Further Action Required, then the WBIT will communicate the same to the Whistleblower.
- On an ad hoc basis:
 - ✓ The Whistleblowing Committee (WBC) shall convene (on a date to be determined ASAP) if a Whistleblowing Complaint implicates a member do the BOD, RMC and/or ExCom.
 - ✓ The WBIT shall recommend changes to the composition of the WBIT if a Whistleblowing Complaint implicates a member of the WBIT.

**4th Working Day**

- The WBIT recommends investigating into the matter or proceed with Next Steps to the Group CEO / CEO.
- The Group CEO / CEO provides a decision on the WBIT's recommendation that will lead to addressing and/or concluding the investigation.

**5th Working Day Onwards Until Conclusion**

- The WBIT makes an appointment with the Whistleblower for a face-to-face interview.
- The WBIT secures confirmation that the Whistleblower agrees to keep the matter Private & Confidential.
- The WBIT communicates that the investigation process shall take at least 2, 3 weeks, subject to the complexity of the case and other external factors (OR reconfirms receipt of the Whistleblowing Complaint and conveys that No Further Action is required), with justification.
- The WBIT interviews the Whistleblower.
- The WBIT contacts and interview witnesses.
- The WBIT contacts the relevant department(s) for information.
- The WBIT provides the Group CEO / CEO with summary findings and Next Steps recommended for approval.
- The WBIT the relevant RMC Chairman with the summary findings and Next Steps / resolution by the Group CEO / CEO / PO.
- The Group CEO / CEO acts on the Next Steps / resolution approved.
- The WBIT reports the investigation Summary and outcome at the next Board of Directors' Meeting.
- In the event the complaint received involves a crime that has been identified, the WBIT shall recommend the matter to the relevant authorities.
- The Group CEO / CEO makes a report themselves or instruct a relevant HoD / Designated Personnel to make the report.
- The WBIT concludes the investigation by communicating the investigation outcome / resolution to the Whistleblower or recommend further investigation, if required, recommends further investigation, if required.