

Tricor Malaysia

# Whistleblowing Policy

Nov 2020

## Information Sheet

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Applicability	Tricor Services (Malaysia) Sdn Bhd (“Tricor Malaysia”) and all its subsidiaries
Scope	This Anti-Corruption & Bribery Policy is applicable to Tricor and across all subsidiaries of Tricor Malaysia, all levels and all business/support units in Tricor Malaysia
Issued by	Legal and Compliance, Tricor Malaysia
Version	1.1
Approved by	Board of Directors of Tricor Malaysia
Approval date	1 June 2020
Effective from	1 June 2020
New review date	5 November 2020

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## **Forms**

1. Whistleblower Report Form

## **1. About this policy**

- 1.1 Tricor Services (Malaysia) Sdn Bhd and all its subsidiaries (“hereinafter referred to as “Tricor”) are committed to conducting our business with honesty and integrity, and we expect all employees to maintain high standards in accordance with our Code of Conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.
- 1.2 The aims of this policy are:
- (a) To encourage whistleblower to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
  - (b) To provide whistleblower with guidance as to how to raise those concerns.
  - (c) To reassure whistleblower that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy covers all employees, officers, consultants, contractors, interns, casual workers, agency workers and external parties.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## **2. Personnel responsible for the policy**

- 2.1 The Board of Directors, through its delegation to the Audit Committee, has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 2.2 The Tricor Compliance Officer has day-to-day operational responsibility for this policy, and must ensure that management and staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 2.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Tricor Compliance Officer.

## **3. What is whistleblowing?**

- 3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:
- (a) criminal activity;
  - (b) failure to comply with any legal or professional obligation or regulatory requirements;
  - (c) danger to health and safety;
  - (d) bribery;
  - (e) financial irregularities, money laundering or misappropriation of funds;
  - (f) breach of our internal policies and procedures;
  - (g) conduct likely to damage our reputation or financial wellbeing;
  - (h) unauthorised disclosure of confidential information;

- (i) negligence; default, breach of trust and breach of duty; or
- (j) the deliberate concealment of any of the above matters.

3.2 A **whistleblower** is a person who raises a **genuine concern** relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

3.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

3.4 If you are uncertain whether something is within the scope of this policy you should seek advice from the Tricor Compliance Officer, whose contact details are at the end of this policy.

#### **4. Raising a whistleblowing concern**

4.1 Any Whistleblowing concern that is discovered or genuinely suspected by the whistle-blower shall be reported immediately.

4.2 A report of Whistleblowing concern may be made by completing the **Whistleblower Report Form** (attached) & emailing the completed to one of the following:

- Dr Veerinderjeet Singh  
Non -Executive Chairman of Tricor Malaysia  
Unit 30-01, Level 30, Tower A,  
Vertical Business Suite,  
Avenue 3, Bangsar South,  
No. 8, Jalan Kerinchi 59200 Kuala Lumpur  
Contact: +6012 218 0624  
Email: [Veerinder@my.tricorglobal.com](mailto:Veerinder@my.tricorglobal.com)
  
- Mr. Yeap Kok Leong  
Chief Executive Officer / Managing Director of Tricor Malaysia  
Unit 30-01, Level 30, Tower A,  
Vertical Business Suite,  
Avenue 3, Bangsar South,  
No. 8, Jalan Kerinchi 59200 Kuala Lumpur  
DID: +6(03) 2783 9188 Fax: +6(03) 2783 9111  
Email: [kok.leong.yeap@my.tricorglobal.com](mailto:kok.leong.yeap@my.tricorglobal.com)
  
- Ms. Oh Swee Chin  
Chief Operating Officer of Tricor Malaysia  
Unit 30-01, Level 30, Tower A,  
Vertical Business Suite,  
Avenue 3, Bangsar South,  
No. 8, Jalan Kerinchi 59200 Kuala Lumpur  
DID: +6(03) 2783 9168 Fax: +6(03) 2783 9111  
Email: [swee.chin.oh@my.tricorglobal.com](mailto:swee.chin.oh@my.tricorglobal.com)

- Ms. Lai Yi Pui  
Group Compliance Officer, Tricor Malaysia  
Unit 30-01, Level 30, Tower A,  
Vertical Business Suite,  
Avenue 3, Bangsar South,  
No. 8, Jalan Kerinchi 59200 Kuala Lumpur  
DID: +6(03) 2783 9196 Fax: +6(03) 2783 9111  
Email: [yi.pui.lai@my.tricorglobal.com](mailto:yi.pui.lai@my.tricorglobal.com)

4.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or trusted person to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4.4 We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

## **5. Confidentiality**

5.1 We hope that whistleblower will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

5.2 We do not encourage whistleblower to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Tricor Compliance Officer or one of the other contact points listed in paragraph 4 and appropriate measures can then be taken to preserve confidentiality.

5.3 If you do not provide your identity however, we will assess the content of your report in the same way as if you had revealed your identity, and any investigation will be conducted as is possible in the circumstances. However, an investigation may not always be possible unless sufficient information is provided, and it may be difficult to offer you the same level of practical support and protection if Tricor does not know your identity.

## **6. Investigation and outcome**

6.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

6.2 In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

6.3 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

6.4 If we conclude that a whistleblower has made false allegations maliciously or the whistleblower breaches any policies, applicable law or regulation, the whistleblower will be subject to disciplinary action.

## **7. Reporting externally**

- 7.1 Nothing in this policy is intended to restrict a whistleblower from raising a concern regarding disclosable matters, providing information to, or communicating with a government agency, law enforcement body or a regulator in accordance with any relevant law or regulation applicable in a jurisdiction in which Tricor operates. Tricor staff may also be legally required to report certain matters to government or regulatory bodies.
- 7.2 It is recommended that any individuals contemplating reporting matters outside of Tricor first seek independent advice in relation to their legal rights and obligations.
- 7.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a client, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 4 for guidance.

## **8. Protection and support for whistleblowers**

- 8.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 8.2 Whistleblowers (subject to paragraph 6.4) must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Tricor Compliance Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 8.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

Please provide the following details for any suspected serious 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.

*Note: Please follow the guidelines as laid out in the Whistleblowing Policy.*

Reporter's Contact Information		
Name		
I/C No. / Passport No. / Staff No.		
Correspondence Address		
Telephone No.	Home	
	Office	
	Mobile	
E-mail Address		
Designation / Occupation		
Division/Section/Unit/Branch		
Preferred method of communication	<input type="checkbox"/> Mail <input type="checkbox"/> E-mail <input type="checkbox"/> Telephone /SMS	

Suspect's Information			
Individual 1			
Name			
Designation			
Division/Section/Unit/Branch			
Contact Number		Email Address	
How do you know this employee?			
Individual 2			
Name			
Designation			
Division/Section/Unit/Branch			
Contact Number		Email Address	
How do you know this employee?			
Individual 3			
Name			
Designation			
Division/Section/Unit/Branch			
Contact Number		Email Address	
How do you know this employee?			



**Details of the misconduct**

COMPLAINT: Briefly describe the misconduct / 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.

What misconduct / improper activity occurred?

Who committed the misconduct / improper activity?

When the misconduct / improper activity occurs? And since when did you notice about it?

Where did the misconduct / improper activity happen?

Is there any evidence that you could provide to us?\*

Do you have any other details or information which would assist us in the investigation?

If money involved, can you estimate the amount of money involved?	Yes	No
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If YES, please indicate the estimated amount of money involved (cross X where applicable):

- Less than RM500
- RM501 to RM10,000
- RM10,001 to RM50,000
- More than RM50,001

Have you lodged a complaint on this matter to another person / department / authority before?	Yes	No
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If YES, please indicate the person / department / authority that the report was lodged (cross X where applicable and attach copy of the report made):

- Police
- Malaysian Anti-Corruption Commission
- Others, please indicate:

Date of Report was made	
Status of report made	

**Declaration**

I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.

I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.

Signature	
Name	
Date	

**For office use only**

Record No.	
Receipt Information	Person receiving this report:
	Date Received:
	Acknowledgement of receipt sent on:

Investigation required (YES / No)? (If No please state the reason)

Investigation Done By:

Investigation Result:

Action Taken / Conclusion:

Reported to the Board on:

Signed off by: