



PANSAR BERHAD

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Whistleblowing Policy

SOP Title	Whistleblowing
Module	Employee Code of Conduct

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1.0 INTRODUCTION

The Board of Directors (“the Board”) of Pansar Berhad and its subsidiaries (collectively “Pansar” or the “Company”) is committed to maintain and achieve the highest possible standards of integrity and accountability in all aspects of its business. Pansar aims to conduct its business dealings in an ethical, responsible and transparent manner.

All whistleblowing of violations has to be conducted in good faith; otherwise stern disciplinary action will be taken against the whistleblower.

2.0 OBJECTIVE

This policy shall assist and encourage employees, consultants, contractors, and vendors to raise genuine concerns regarding any suspected and/or known violation, abuse and misconduct involving the resources of the Company and its subsidiaries. In addition, this policy is created to protect the whistleblower in-line with the protection accorded to the Whistleblower Protection Act 2010.

In order to meet the intended objectives, this policy is tailored to:

- (a) Promote and maintain high transparency and accountability in the workplace;
- (b) Promote good corporate governance practice in the workplace;
- (c) Ensure that employees can raise concerns without fear of reprisals and safeguard such person’s confidentiality;
- (d) Reasonable protection for a whistleblower from reprisal as a consequence of making a disclosure;
- (e) Provide a transparent and a confidential process for dealing with concerns;
- (f) Protect the long-term reputation of the Company;
- (g) Support the Company’s values; and
- (h) Maintain a healthy working culture and an efficient Company.

3.0 SCOPE

This segment applies to all directors and employees, whether permanent, fixed-term, or temporary, under Pansar.

4.0 DEFINITIONS

All the below mentioned citations/examples are not intended to be comprehensive and is for explanatory purposes only.

BRIBERY & CORRUPTION means any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA). In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person who is in a position of trust within an organisation.

Bribery may be 'outbound', where someone acting on behalf of the Company attempts to influence the actions of someone external, such as a Government official or client decision-maker. It may also be 'inbound', where an external party is attempting to influence someone within the Company such as a senior decision-maker or someone with access to confidential information.

DISCIPLINARY ACTION means formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

EMPLOYEE means directors, managers, senior executives, officers, consultants, contractor, trainees, casual workers, intern's agents or any other person associated with the Company.

GRATIFICATION as defined by MACC Act:

- (a) money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;
- (b) any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;
- (c) any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- (d) any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;
- (e) any forbearance to demand any money or money's worth or valuable thing;
- (f) any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and
- (g) any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).

INDIVIDUAL means an employee or colleagues or a superior or any person having business with the Company.

MANAGEMENT means the Managing Director, General Manager or any person who is officially delegated.

5.0 POLICY DETAILS

Acts of misconduct as defined by Pansar's Code of Conduct and Ethics, and criminal offences under the law (all the below mentioned citations are not intended to be comprehensive and are for explanatory purposes only):

5.1. General Misconduct in office or workplace:

- a) Use of vulgar or abusive language/behavior against any individual;
- b) Intentional disobedience to any lawful and reasonable instructions of superior
- c) Threatening or use of violence or harassment against any individual
- d) Use of Company's property or facilities to commit or attempt to commit misconduct;
- e) Sexual harassment against any individual, also restricted in the "Code of Practice on the Prevention and Eradication of Sexual Harassment in the Workplace" issued by the Malaysia Ministry of Human Resource.

5.2. Illegal Conduct/Intention/Action in office, Company facilities, or while acting on behalf of the Company

- a) Dishonesty, fraudulent cases, cheating, theft;
- b) Corruption, bribery, blackmail;
- c) Breach of laws, rules and regulations

5.3. Conflict of Interest during employment

- a) All employees shall refrain from knowingly placing him/herself in a position of conflict of interest/statutory duties in the Company;
- b) Employees have to ensure that their personal finances do not affect their independent judgment/decision or adversely affect their job performance;
- c) Employees must not have direct or indirect involvement in other employment unless otherwise approved by Management.

5.4. Unethical Conduct in the office and Company facilities or while acting on behalf of the Company

- a) Discriminatory act of religious, racial or sexual nature;
- b) Serious non-professional or non-ethical behavior;
- c) Action which causes hazard to the health and safety of any individual.

6.0 PROTECTION TO WHISTLEBLOWER

6.1. All report of violation is held in the strictest confidence and the Company shall not reveal the whistleblower's identity unless required by law.

- 6.2. This policy is to provide a guarantee to all employees from any form of revenge and immunization from any form of disciplinary action from the Management provided that the event and violation report is conducted in good faith.
- 6.3. The whistleblower should act with high integrity and responsibility; and shall identify himself/herself by providing contact details such as name, phone number and email.
- 6.4. The whistleblower may be required to stand as a witness for the Company, and to assist in all investigations and any lawsuits.

7.0 REPORTING OF VIOLATION

- 7.1. The whistleblower shall send in a misconduct report to the **Audit Committee Chairman** via the whistleblowing email ***whistleblower@pansar.com.my***.
- 7.2. The Audit Committee Chairman will set up an investigating team to investigate after receiving such a report in regards to any violation.
- 7.3. The progress of the investigation, detail findings, and recommendation will be reported directly to the **Audit Committee Chairman**.

8.0 WRONGFUL DISCLOSURE

- 8.1. Wrongful disclosure is where the whistleblower was found to have:
 - i) Committed a wrongdoing;
 - ii) Taken serious risk which would likely cause a wrongdoing;
 - iii) Made a disclosure not following the requirements of this policy (for instance making dishonest, mischievous or malicious complaints); or
 - iv) Participated or assisted in any process according to this policy which was not done in good faith.
- 8.2. The Audit Committee Chairman will determine if any Disciplinary Action is to be taken against the person who made the wrongful disclosure.