



**KUMPULAN PERANGSANG SELANGOR BERHAD**

(Company Registration No:197501002218/23737-K)

**WHISTLEBLOWING POLICY  
& GUIDELINES  
VERSION 4/2024**

APPROVED BY BOARD

26 March 2024

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## **1.0 INTRODUCTION**

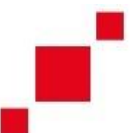
- 1.1 All employees of Kumpulan Perangsang Selangor Berhad (“KPS Berhad” or “the Company”) and members of the public are encouraged to raise genuine concerns pertaining to the Company at the earliest opportunity and in an appropriate way. If an employee and or members of public believes there is a wrongdoing in the Company (e.g. Superiors or colleagues may be committing a criminal offence), he/she can report this by following the correct procedures and staff employment rights are protected.
- 1.2 Employees are often the first to realise that there may be serious wrongdoing within the Company. However, employees may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the Company. Employees may also fear harassment or victimization. In these circumstances, employees may feel that it is easier to ignore the concern rather than to report it.
- 1.3 The Policy has been formulated in accordance with the provisions of the guidance under the Malaysian Code of Corporate Governance and in line with global best practices, the Malaysian Anti-Corruption Commission Act 2009 Whistleblower Protection Act 2010 and all other applicable laws in Malaysia.

### **1.4 Scope**

#### 1.4.1 The Policy governs:

- i. Conduct which is an offence or a breach of law;
- ii. Conduct which is a breach of the Company’s rules and regulations, or other policies or standards which the Company applies;
- iii. Possible fraud and corruption;
- iv. Disclosure related to possible miscarriage of justice;
- v. Health and safety issues which is in violation of the relevant laws and standards;
- vi. Sexual or physical abuse; and
- vii. Other unethical conduct

The above list is not exhaustive and includes any act or omissions, which if proven will constitute an act of misconduct under KPS Berhad’s Code of Business Conduct and Ethics (“COBE”)



1.4.2 This Policy is not intended for employees' grievance or complaint procedure (example: personal grievances concerning an individual's terms and conditions of employment, performance assessments, bonus and increment allocations or other aspects of the working relationship) which is governed by the existing Human Resource procedures in the Employee Handbook adopted by the Company.

**1.5 Responsibility**

1.5.1 All departments within the Company are primarily responsible for complying to this Policy; and

1.5.2 Chief Integrity & Governance Officer ("CIGO") is responsible for the development and maintenance of this Policy including any reviews, changes, amendments, additions or deletions of any provision of this Policy.

**1.6 Approving Authority**

The Board of Directors ("Board") is the approving authority of this Policy.

**1.7 Date of Implementation**

This Policy is effective immediately upon approval by the Board.

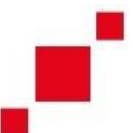
**1.8 Review Frequency**

This Policy will be reviewed by Integrity and Governance Unit ("IGU") every three (3) years at the latest, to ensure the effectiveness of the management and implementation of this Policy.

**1.9 Reference**

This Policy should be read together with the current following guidance and policies of the Company.

- (a) Whistleblower Protection Act 2010;
- (b) Malaysian Anti-Corruption Commission Act 2009;
- (c) Corporate Governance Guide - Towards Boardroom Excellence (Bursa Malaysia Securities Berhad);
- (d) Financial Authority Limit & Delegation of Authority;
- (e) Code of Conduct;



- (f) Employees Handbook;
- (g) Compliance Policy;
- (h) Anti-Bribery and Corruption Policy; and
- (i) Personal Data Protection Policy.

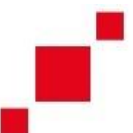
#### 1.10 **Definition**

The key terms and acronyms appeared in this document shall be defined as per **Appendix I**.

## 2.0 **OBJECTIVES OF THIS POLICY**

2.1 This Policy aims to: -

- 2.1.1 Encourage employees and members of the public, to question and act upon concerns pertaining to the Company at the earliest opportunity and in an appropriate manner.
- 2.1.2 Provide avenues for employees and members of the public, to raise those concerns and where possible, receive feedback on any action taken so that it can be addressed in an independent and unbiased manner.
- 2.1.3 Reassure employees and members of the public that he/she will be protected from possible reprisals or victimisation for raising a concern as defined in the Policy (Para 5.1).



### **3.0 STATEMENT OF POLICY**

KPS Berhad commits to a high standard of professionalism and ethics in the conduct of our business and professional activities consistent with KPS Berhad's core values of **PRIDE, RESPECT, INTEGRITY, DISCIPLINE** and **EXTRA-MILE**. The Company is committed to the highest standards of openness, integrity, probity and accountability. KPS Berhad aspires to conduct its affairs in an ethical, responsible and transparent manner.

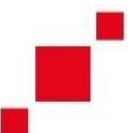
### **4.0 KEY PRINCIPLES**

- 4.1 Protection of the whistleblower - all genuine concerns will be handled responsibly, professionally and in a positive manner where help and support will be available to employees where concerns are raised under this Policy.
- 4.2 Security and confidentiality - the Company shall protect the whistleblower's identity and keep the process confidential.
- 4.3 Professionalism - the Company is committed to the highest standards of openness, integrity, probity and accountability. We encourage employees and members of public with concerns pertaining to the Company to raise those concerns to the appropriate Authority.

### **5.0 PROTECTION UNDER WHISTLEBLOWING POLICY**

#### **5.1 Harassment or Victimization**

- 5.1.1 The Company will not tolerate any harassment, discrimination or victimisation (including informal pressures) and shall take appropriate action possible to protect the Reporting Individual;
- 5.1.2 Any employee who threatens retaliation against a Reporting Individual shall be subject to disciplinary action, including termination of employment;
- 5.1.3 A Reporting Individual who raises his concern under this Policy shall not be at risk of losing his job or suffer any form of retribution as a result thereof provided that:
  - The disclosure is made in good faith;
  - He/She reasonably believes that the information, and any allegations contained therein, are reasonably true; and
  - He/She is not acting for personal gain



5.1.4 The act of lodging a report will not in itself protect the Reporting Individual from the consequences of improper conduct in which he/she may have been involved or implicated.

## **5.2 Confidentiality**

5.2.1 The Company recognises that the Reporting Individual may wish to raise a concern in a confidential manner. Any Reporting Individual wishing to protect his/her identity is at liberty to do so. All reports of wrongdoings and information received shall be fully treated in strict confidence possible to protect the identity of the Reporting Individual.

5.2.2 If a situation arises where revealing the Reporting Individual's identity is necessary to resolve the matter (e.g. in a court proceeding and internal inquiries), this matter shall be resolved through consultation with the Reporting Individual.

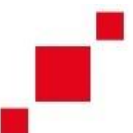
5.2.3 Any reports of wrongdoings and/or matters related thereto shall not be disclosed or discussed with any third party other than those who have a legitimate need to know. This is important in order to avoid damaging the reputation of persons suspected but subsequently found innocent and discharged of wrongful conduct, as well as to protect the Company from potential civil liability.

## **5.3 Anonymous Allegations**

5.3.1 Anonymous reports are not encouraged, as any follow up to ascertain the facts or to obtain further information for investigation purposes would be difficult.

5.3.2 However, if a Reporting Individual chooses to make anonymous disclosures, the disclosure must contain sufficient information for the Company's consideration. Factors in determining the Company's consideration to investigate shall include:

- Seriousness of the issues raised;
- Credibility of the issues raised;
- Likelihood of confirming the allegation from an attributable source; and
- That the disclosure was done in good faith.
- Evidence(s) if any.



**5.4 Untrue, False, Malicious and/or Reckless Allegations**

5.4.1 The Company is sincere in its efforts to address genuine concerns. If the Reporting Individual raises a concern in good faith no action will be taken against the Reporting Individual

5.4.2 If the Reporting Individual raises a concern frivolously/maliciously or for personal gain, appropriate actions, including stern disciplinary action shall be taken against the Reporting Individual which may include termination of employment.

**6.0 HOW TO RAISE A CONCERN**

6.1 Concerns may be raised with your Immediate Superior or the designated IGU's Officer. If the Reporting Individual wishes to raise the concern anonymously, he/she can do so via the following channels:

6.1.1 **Whistleblowing Hotline at 03-5524 8448**

6.1.2 Write a letter/ whistleblowing form to:

Chief Integrity and Governance Officer

Integrity and Governance Unit

Kumpulan Perangsang Selangor Berhad

Tingkat 17 Plaza Perangsang

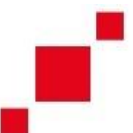
Persiaran Perbandaran

40000 Shah Alam, Selangor Darul Ehsan

6.1.3 Email submission: **integrity@kps.com.my**

Note: **Whistleblowing Form** can be downloaded via KPS Berhad's website.

6.2 If the Reporting Individual believes that the matter is so serious and cannot be raised via any of the channels under Para 6.1.1 to 6.1.3 above, they should contact the Board Governance and Risk Committee Chairman at **chairmanbgrc@kps.com.my**, being the Director identified in the Company's Annual Report as one to whom concerns may be conveyed.





6.3 KPS Berhad understands that a Reporting Individual might also have concerns against any member of the board of directors of KPS Berhad and/or its subsidiaries. The Reporting Individual in such circumstance can lodge reports with:

6.3.1 Royal Malaysia Police; or

6.3.2 Bank Negara Malaysia; or

6.3.3 Malaysian Anti-Corruption Commission (MACC); and/or

6.3.4 any other enforcement agencies as defined under the Whistleblower Protection Act 2010 and

A copy of the said report may be forwarded to the CIGO to enable the IGU to conduct its own internal investigations.

#### **6.4 Information Required When Lodging a Report**

6.4.1 When lodging a written report, the Reporting Individual shall try to provide the following information:

6.4.1.1 Background and history of the concerns, giving names, dates, places, facts and data or evidence where possible; and

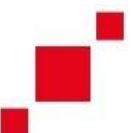
6.4.1.2 Reason why the Reporting Individual is particularly concerned about the matter he/she has raised.

6.5 The Reporting Individual needs to demonstrate that there are reasonable grounds for his/her concern and that the report is done in good faith and not for personal interest. The earlier the concern is raised, the easier it is to take action.

6.6 Where a report has been received by the Company via one of the foregoing channels, the Reporting Individual will be informed within five (5) working days:

6.6.1 Acknowledging that the concern has been received and recorded; and

6.6.2 Informing whether further investigations will take place and if not, stipulating the reason.



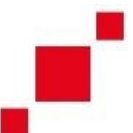
## **7.0 HOW THE COMPANY WILL RESPOND**

- 7.1 The Company's response will depend on the nature of the concern. It may be:
- 7.1.1 Investigated internally;
  - 7.1.2 Referred to the internal/ external auditor;
  - 7.1.3 The subject of an independent inquiry; and
  - 7.1.4 Referred to the Enforcement Agencies.
- 7.2 Initial reports of concern will be forwarded to the IGU's Officer who has the authority to act independently. The IGU's Officer may consult others including Chairman of the Board Governance & Risk Committee ("BGRC"), and will decide whether an investigation is warranted and, if so, what form it should take. The IGU's Officer may decide to take no further action if a complaint appears to be trivial, malicious or mala fide. All such decisions will be reported at the next BGRC Meeting in a summarized form.
- 7.3 If the concern raised involves the IGU's Officer, the MD/GCEO, in consultation with the Chairman of the BGRC, will nominate another authorised Officer to conduct initial enquiries vested with the same authority as the IGU's Officer.
- 7.4 If the concern raised involves any member of the Board of KPS Berhad and its subsidiaries including Chairman of the BGRC, the CIGO will report directly to the Chairman of KPS Berhad. Whereas if the concern raised involves the Chairman of KPS Berhad, the CIGO will report directly to a Senior Independent Director as nominated by the Nomination and Remuneration Committee.
- 7.5 Some concerns may be resolved by agreed action without the need for investigation. Any decision to solve matters in this way will be taken or confirmed and recorded by the IGU's Officer. If urgent action is required, it may be taken before any investigation is conducted. Any action taken or agreed will normally be reported at the next BGRC Meeting.
- 7.6 If any investigation is required, the IGU's Officer may consult with others including the Chairman of the BGRC and may designate an authorised Officer to investigate the concern.

- 7.7 The amount of contact between the officers considering the issues and the employee raising the concern will depend on the nature of the matter raised, the potential difficulties involved, relevance and clarity of the information provided.
- 7.8 IGU's Officer will try to minimize any difficulties which the Reporting Individual may have as a result of raising a concern. For instance, if the Reporting Individual has to give evidence in criminal, civil or disciplinary proceedings, IGU's Officer will advise for the Reporting Individual about the procedures.
- 7.9 The Reporting Individual needs to be assured that the matter has been properly addressed. Subject to legal constraints, IGU's Officer will inform the Reporting Individual about the outcomes of any investigation. It is the Company's prerogative to decide whether to conduct an investigation and to decide the final outcome.
- 7.10 The IGU's Officer will report the outcome of any investigation to the BGRC who will oversee the implementation of any recommendation arising from the investigation.
- 7.11 IGU's Officer shall inform the Reporting Individual of the result of any investigation and action taken by the Company (as mentioned under Whistleblower Act 2010 Section 14 (6)).

## **8.0 ADMINISTRATION**

- 8.1 All information gathered for each case shall be managed and restricted internally on a "need to know" basis only.
- 8.2 The CIGO has overall responsibility for the administration and enforcement of this Policy and may liaise as necessary with others including the Chairman of the BGRC.
- 8.3 The CIGO shall maintain proper records of concerns raised and the outcomes (but in a form which does not endanger employee confidentiality) and will report directly to the BGRC.

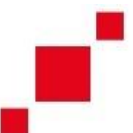


**9.0 COMPLIANCE**

- 9.1 This Policy is applicable to ALL employees of KPS Berhad at all times.
- 9.2 Any alleged or suspected improper conduct must be reported immediately to the Head of Department and/or Integrity and Governance Unit. Any party(ies) who have concerns with regards to any malpractice or breach of this Policy can lodge their concern via the dedicated whistleblowing channel which will be evaluated and investigated independently.
- 9.3 Any violation of the Policy shall be deemed as a major breach of discipline and is subject to disciplinary actions.
- 9.4 All staff are not allowed to disseminate any documents to any external party. Prior approval from Key Management is required if any document is to be given to an external party.

**10.0 AMENDMENT**

The Board is empowered to amend and/or modify this Policy from time to time.



**Appendix I: Definition**

<b>Terms</b>	<b>Definition</b>
<b>Board</b>	means Board of Directors of KPS Berhad
<b>BGRC</b>	Refers to Board Governance and Risk Committee of KPS Berhad
<b>Compliance</b>	means conformity with requirements under law or contract terms affecting the Group's operations locally and abroad.
<b>Complaint</b>	Disclosure of improper conduct made by whistleblower.
<b>Employee Handbook</b>	Means the handbook of the Company governing among others the conduct of employees of the Company regarding the policies, procedures, expectations, and Company culture
<b>IGU</b>	Integrity and Governance Unit under Legal and Compliance Department
<b>IGU's Officer</b>	Refers to Chief Integrity and Governance Officer (CIGO)/Integrity and Governance Officer (IGO) and/or any other officer appointed to carry out investigation on behalf of IGU Officer.
<b>Improper conduct</b>	Any unethical behaviour, malpractices, illegal acts or any other wrongful or improper conduct within KPS Berhad which if proved, constitutes a disciplinary offence or a criminal offence.
<b>Key Management</b>	Refers to person in any of the following positions: <ul style="list-style-type: none"> <li>• Managing Director / Group Chief Executive Officer (MD/GCEO)</li> <li>• Deputy Chief Executive Officers; and</li> <li>• Head of Department (HOD)</li> </ul>
<b>KPS Berhad/ the Company</b>	means Kumpulan Perangsang Selangor Berhad
<b>KPS Berhad Group or the Group</b>	means KPS Berhad and its subsidiary companies collectively, as defined in Section 4 of the Companies Act 2016
<b>Policy</b>	Means the Whistleblowing Policy and Guidelines
<b>Reporting Individual(s)</b>	Refers to a person or group of persons who make/s a whistleblowing report. Such person or group of persons may include employees, members of public and/or third-party stakeholders.
<b>Whistleblower</b>	Any employee, director, consultant, contractor or vendor or any member of public making a complaint and/or a report under this Policy or to any Enforcement Agency.

