# WHISTLEBLOWING POLICY

## **POLICY STATEMENT**

Econsave Cash & Carry Sdn Bhd and its related companies (together referred to as the "ECONSAVE Group") is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations.

The ECONSAVE Group strives to achieve the highest standard of work ethics in the conduct of business in line with ECONSAVE Group's Code of Conduct & Business Ethics.

In line with good corporate governance practices, ECONSAVE Group provides avenue for all employees of ECONSAVE and members of the public to disclose any improper conduct within ECONSAVE.

# 1. OBJECTIVE

The objective of this policy and procedure is to provide a mechanism for all level of employees and stakeholders of the ECONSAVE Group, acting in good faith, to disclose any improper conduct and to provide protection for employees and members of the public who make such a report.

This policy is designed to provide a transparent and confidential process for dealing with concerns. The employee's concerns about any improper conduct should be reported to his or her Head of Department. If for any reason the employee finds it difficult to report to his or her Head of Department, the employee may report the concerns through the whistleblowing channels.

## 2. SCOPE

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channels. Such improper conduct or criminal offence include, but are not limited to the following: -

- i) Fraud;
- ii) Conflict of interest;
- iii) Abuse of power;
- iv) Theft or embezzlement,
- v) Bribery and corruption;
- vi) Breach of employee's code of conduct;

vii) Deliberate concealment of any of the above.

#### 3. WHISTLEBLOWING CHANNELS

Any employee or member of the public who has knowledge or is aware that any improper conduct has been, is being, or is likely to be committed within the ECONSAVE Group is encouraged to make a disclosure at the earliest opportunity so that corrective action can be taken as soon as possible via the following reporting channels:

i) Whistleblowing hotline: 019-339 1587

ii) E-mail: legal.dept@econsave.com

Email to this channel will be notified to: -

- Compliance Officer
- Director

The following information shall be included when making such a disclosure in order to facilitate an investigation into the alleged improper conduct: -

- a) Brief description of the improper conduct;
- b) The date, time and location of the incident;
- c) Name(s) of the person(s) involved;
- d) Particulars of any witnesses, if any;
- e) Supporting documents and/or evidence;
- f) Other relevant details that are deemed to be useful to facilitate screening and action to be carried out.

The whistleblower is encouraged to disclose his/her personal details to enable the relevant parties conducting the investigation to contact the whistleblower for further information. The Whistleblowing Form can be <u>downloaded here</u>.

## 4. RESPONSIBILITIES

The Compliance Unit shall be responsible for the administration and compliance with this policy and procedures.

All employees are responsible for reporting all suspected cases of improper conduct or theft by an employee to the Head of Internal Audit and/or Head of Compliance.

# 5. PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. All reports made and the identity of the informer will be treated with the strictest confidence. The informer will be protected from reprisal, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and/or the rules and procedures involved.

A whistleblower will not be subject to any civil action or criminal liability and no administrative process can be taken against the whistleblower for making disclosure of improper conduct.

# 6. ANONYMOUS WHISTLEBLOWER

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his/her identity to the ECONSAVE Group in order for the ECONSAVE Group to accord the necessary protection to him/her. However, the ECONSAVE Group reserves its right to investigate any anonymous disclosure.

## 7. INVESTIGATION

Upon receiving the report of any alleged improper conduct, it will be investigated by the Head of Internal Audit and/or Compliance Officer. This may involve an informal review, an internal inquiry or a more formal investigation.

If the outcome results in a proven case of improper conduct and confirms the allegation, disciplinary action shall be instituted against the employee(s) concerned in accordance with the ECONSAVE Group's policy.