

<b>Big Dataworks Sdn. Bhd.</b>  <b>Document No.</b> POL/WB/GIA-BDW/1.0/2019	<b>RESTRICTED</b> <b>WHISTLEBLOWING POLICY &amp; PROCEDURE</b>	
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# **WHISTLEBLOWING POLICY & PROCEDURE**

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## **DOCUMENT HISTORY**

<b>VERSION</b>	<b>SUMMARY OF CHANGE</b>	<b>EFFECTIVE DATE</b>
1.0	Establishment of BDW Whistleblowing Policy & Procedure	1 December 2019

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## **WHISTLEBLOWING POLICY**

### **Policy Statement**

Big Dataworks Sdn. Bhd. (BDW) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, BDW provides avenue for all employees and members of the public to disclose any improper conduct within the Company.

### **Objective of the Policy**

This policy is to provide an avenue for all employees of BDW and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

### **Scope of the Policy**

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- Fraud;
- Bribery;
- Abuse of Power;
- Conflict of Interest;
- Theft or embezzlement;
- Misuse of Company's Property;
- Non Compliance with Company Policy

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under company's Employee Code of Conduct or any criminal offence under relevant legislations in force.

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## **Applicability of the Policy**

This policy applies to all employees of BDW and its subsidiaries. This policy also applies to members of the public, where relevant.

## **Implementation Procedures**

Every complaint, report or information can be channelled via mail, email or telephone or a face-to-face meeting. It is imperative where possible that a meeting with the complainant be made to ensure the credibility and validity of the information received.

The whistleblowing channels available include the following:

- To fill the Whistleblowing Form (Appendix 1) and email it to [whistleblowing@bigdataworks.com.my](mailto:whistleblowing@bigdataworks.com.my)
- Phone at 03-7985 5352
- Written letters to Integrity & Governance Unit

Attention to:

**Integrity & Governance Unit**

Level 4, Wisma Commerce Dot Com

15, Lorong Tandang 51/204b

46050 Petaling Jaya, Selangor

The whistleblower, if possible, should state his/her name in the form, as disclosure expressed anonymously is much less credible, but will nonetheless be considered.

It will be the task of the investigation team to assess, investigate and report on the complaint to the Management and recommend a course of action in a prompt and fair manner.

Whistleblower who are making a report in bad faith or based on unfounded allegations or containing trivial, malicious, slanderous and frivolous claims may subject to disciplinary action.

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### **Protection to Whistleblower**

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistle blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within BDW, to the extent reasonably practicable, 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 the rules and procedures involved.

### **Notification**

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

**WHISTLEBLOWING FORM**
**APPENDIX 1**

<b>Name of Employee</b>	
<b>Department</b>	

**Details of Concern:**

<b>Name of Individual(s) Involved</b>	<b>Position Title</b>	<b>Division/Department</b>

Please describe the nature of your concern

[Please provide descriptions of your concern including precise information such as date(s) and time of event(s), meeting(s) or correspondence(s) that have taken place, reference to relevant documents or policies].

Note: To continue on a new sheet if there is insufficient space.

**Do you have any evidence that you can provide to support the improper conduct or concern?**

No

Yes, I will forward them in due course

Yes, the documents are attached with this form


Signature (Optional)/Date

**FOR INTERNAL USE**

<b>Date and Time Received</b>	<b>Received By</b>