

Commerce Dot Com Sdn. Bhd.	RESTRICTED WHISTLEBLOWING POLICY & PROCEDURE	
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WHISTLEBLOWING POLICY & PROCEDURE

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DOCUMENT HISTORY

VERSION	SUMMARY OF CHANGE	EFFECTIVE DATE
1.0	Establishment of CDC Group Whistleblowing Policy & Procedure	1 December 2019

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WHISTLEBLOWING POLICY

Policy Statement

CDC Group 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, CDC Groups 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 CDC Group 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.

Applicability of the Policy

This policy applies to all employees of CDC 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@commercedc.com.my
- Phone at 03-7985 5352
- Written letters to the Head of Governance, Integrity and Audit Division

Attention to:

Governance, Integrity and Audit

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.

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 CDC Group, 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

Name of Employee	
Department	

Details of Concern:

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

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

Date and Time Received	Received By