



Whistleblowing Policy

Prepared by:
Integrity & Risk Management Unit (IRMU)

November 2021

TABLE OF CONTENTS

NO.	TITLE	PAGE NO.
1	Policy Statement	1
2	Objective of the Policy	1
3	Scope of the Policy	1
4	Applicability of the Policy	1
5	Procedure in Making a Disclosure	2
6	Protection to Whistleblower	2
7	Anonymous Whistleblower	2
8	Notification	2
9	Review and Update	3
	Appendix A - Revision History Sheet	4

WHISTLEBLOWING POLICY

1. Policy Statement

SEDC 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, SEDC provides avenue for all employees of SEDC and members of the public to disclose any improper conduct within SEDC/involved SEDC Management and Staff.

2. Objective of the Policy

This policy is to provide an avenue for all employees of SEDC 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.

3. 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:

- i. Fraud
- ii. Bribery
- iii. Abuse of Power
- iv. Conflict of interest
- v. Theft or embezzlement
- vi. Misuse of Company's Property
- vii. Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which is proven, will constitute an act of misconduct under "Kod Budaya Kerja SEDC", Anti-Bribery and Corruption Policy (ABC Policy) and SEDC Code of Business Ethics (SCOBEE) or any criminal offence under relevant legislations in force.

4. Applicability of the Policy

Subject to the requirement of applicable local jurisdiction, this policy applies to all Board Members, Directors and employees of SEDC and its subsidiary Companies. This policy also applies to members of the public, where relevant.

5. Procedure in Making a Disclosure

All disclosures are to be channelled in accordance with the procedures as provided under this policy.

Report on improper conduct can be submitted using **Borang Aduan Salah Laku Integriti (BAI)** via:

1. Email: integrity@sedc.my

2. Mail:

Ketua, Unit Integriti & Pengurusan Risiko (IRMU)
Aras 3, Menara SEDC
P.O. Box 400
Lot 2878, The Ithmus
Off Jalan Bako
93050, Kuching, Sarawak

3. Online Form: <https://www.sedc.com.my/integrity-complaints>

6. Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within SEDC, to the extent reasonably practicable, provided that the disclosure is made in good faith.

7. 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 their identity to SEDC in order for the Corporation to accord necessary protection to him/her. However, the Corporation reserves its right to investigate into any anonymous disclosure.

8. 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.

9. Review and Update

The Whistleblowing Policy is subject to a review every five (5) years and will be updated and revised accordingly. Amendments to the policy will be tabled to the SEDC Board. Notwithstanding the periodic review, amendments to the policy can be made anytime, as and when required.

Changes or amendments to the policy will be tracked using the Revision History Sheet. Refer **Appendix A**.

APPENDIX A

Revision History Sheet		
Date	Subject	Remarks
12.11.2021	Cover page	Add: Cover page
12.11.2021	Applicability of the policy	Add: ...including Board Members in paragraph 1.
12.11.2021	Scope of the policy	Add: ...Anti-Bribery and Corruption Policy (ABC Policy) and SEDC Code of Business Ethics (SCOBEE) in paragraph 2.
12.11.2021	Procedure in Making a Disclosure	Add: Report on improper conduct can be submitted using Borang Aduan Salah Laku Integriti (BALI) via: 3. Email: integrity@sedc.my 4. Mail: Ketua, Unit Integriti & Pengurusan Risiko (IRMU) Aras 3, Menara SEDC P.O. Box 400 Lot 2878, The Ithmus Off Jalan Bako 93050, Kuching, Sarawak 4. Online Form: https://www.sedc.com.my/integrity-complaints
12.11.2021	Review and Update	Add: Review and Update section in the policy