

1.0 OBJECTIVES

- 1.1 To provide a mechanism for legitimate concerns related to bribery activities to be raised or reported, investigated and where necessary, appropriate action to be taken to resolve such issues promptly and effectively within the Organisation.
- 1.2 To protect a complainant or whistle-blower (collectively referred to as “Whistle-blower”) from any form of harassment, reprisal or retaliation as a direct consequence of him or her reporting any legitimate concerns under this policy. The protection accorded is to encourage a Whistle-blower to report such legitimate concerns whilst removing any fear or risk or disclosure of his or her identity.

2.0 SCOPE

The procedure applies throughout the Organisation (including entities over which it has control), to all levels of employees, any person associated with the Organisation as well as stakeholders.

3.0 DEFINITION

- 3.1 Whistle-blowing is generally taken to mean the disclosure of insider knowledge by an employee or stakeholder of any attempted/ suspected/ actual:
 - (a) bribery; or
 - (b) violation of or weakness in the Anti-Bribery Management Systemwithin the Organisation.
- 3.2 Whistle-blower is a person who tells someone of higher authority or reports through formal channel (i.e. the Whistle-Blowing Committee) about corrupt / bribery activities.
- 3.3 A person is deemed associated with the Organisation if he or she is a director, partner or employee of the Organisation or he or she is a person who performs services for or on behalf of the Organisation.

4.0 REFERENCES

- 4.1 Anti-Bribery Management System Manual.

5.0 RECORDS

Whistle-blower record.

6.0 RESPONSIBILITY

The Whistle-Blowing Committee is responsible for the administration and investigation of reports of attempted/ suspected/ actual bribery or violation of anti-bribery controls received from Whistle-blowers.

7.0 POLICY STATEMENT

7.1 All reports of attempted/ suspected/ actual bribery or violation of anti-bribery controls should be directed to the Whistle-Blowing Committee for assessment and investigation.


Examples of matters to be reported to the Whistle-Blowing Committee include:

- (a) Issue involving bribery (e.g. offer of bribe to approving authority to approve a dubious product that is knowingly unsafe for use or occupation).
- (b) Issue involving violation of anti-bribery controls (e.g., falsification or manipulation of bribery risk assessment and/or due diligence to deliberately mislead the Organisation into executing a high-risk transaction, project or activity that can result in the Organisation becoming insolvent).
- (c) Issue straddles across jurisdictional boundary or boundaries between two or more compliance functions (e.g., interdepartmental or intercompany or between department and company under the Group).
- (d) The anti-bribery compliance function itself is viewed with suspicion or in violation.
- (e) Situation where the impartiality or independence of the anti-bribery compliance function may be influenced or compromised (e.g., lodging a report against a senior staff or person of influence), etc.

7.2 All information obtained from a Whistle-blower along with his or her identity shall be treated as strictly confidential at all times and not to be disclosed to other parties other than to the person empowered to investigate the case as provided in clause 8.5 below.

7.3 A Whistle-blower who lodges a legitimate concern will be protected, provided that it was made in good faith and that he or she is not later proved to have acted maliciously, vexatious or frivolously or the report or complaint is manifestly untrue or he or she acted for personal gain or personal interest.

7.4 The Organisation views any allegation of harassment, reprisal or retaliation in any form or manner against an employee reporting a genuine legitimate concern seriously

	LOJI RAWATAN AIR SG. SELANGOR FASA 1	ABMSP 09	
	ANTI-BRIBERY MANAGEMENT SYSTEM (ABMS) PROCEDURES	Rev. No.	0
		Rev. Date	1 Jun 2020
		Issued by	QA
Whistle-blowing Procedures	Pages	Page 3 of 6	

and will treat such action as gross misconduct, which if proven after due inquiry, may lead to disciplinary action and/or dismissal of the perpetrator(s).

- 7.5 The Organisation views any party leaking the Whistle-blower's identity and confidential information as a serious breach of protocol and will treat such action as gross misconduct, which if proven after due inquiry, may lead to disciplinary action and/or dismissal of the perpetrator(s).

8.0 PROCEDURES

8.1.1 Employees

If any employee has reasonable ground(s) for believing that bribery activity has occurred or is occurring in the Organisation, the employee has the responsibility to verbally report or verbally disclose it in a timely manner to higher authority (e.g., his or her immediate superior generally) for speedy resolution, if possible.

Otherwise, the initiator or immediate superior may raise a formal report directly to:



the Whistle-Blowing Committee at we_hear@lgb.com.my

8.1.2 Other Stakeholders (other than Employees of the Organisation)

For stakeholders other than employees of the Organisation, they may raise a formal report directly to the Whistle-Blowing Committee at we_hear@lgb.com.my

8.1.3 Manner in Which a Formal Report Can be Filed

Where a written report is furnished to the Whistle-Blowing Committee, it should be sealed in an envelope and marked ***“Strictly Private & Confidential & to be Opened by Addressee only”***.

A hardcopy of the report to the Whistle-Blowing Committee can be addressed or hand delivered to:

The Whistle-Blowing Committee
LGB Group
Level 18, Menara LGB, 1 Jalan Wan Kadir,
Taman Tun Dr. Ismail,
60000 Kuala Lumpur.

- 8.2 A Whistle-blower who submits a formal report (including allegations or complaints) to the Whistle-Blowing Committee shall include the following information:

Rev. No.	0
Rev. Date	1 Jun 2020
Issued by	QA
Pages	Page 4 of 6


Whistle-blowing Procedures

- (a) Name, designation and company/division/department/unit and telephone contact number.
 - (b) Specific description of the incident/case.
 - (c) The name of the individual(s) and entity involved.
 - (d) Documentary evidence, if any, to support the report.
 - (e) Particulars and contact numbers of witnesses, if any.
- 8.3 Anonymous reports are not encouraged, but they may be considered at the discretion of the Whistle-Blowing Committee.
- 8.4 All reports made must be acknowledged by the Whistle-Blowing Committee and immediately thereafter a preliminary investigation must be initiated to determine the validity of the report and whether it merits further investigation.
- 8.5 As a guide, the person empowered to undertake the investigating should:
- (a) be independent and uninvolved in the issue (e.g., another appropriate manager or an appropriate third party);
 - (b) be given appropriate authority, resources and access by Top Management to enable the investigation to be effectively carried out;
 - (c) possess legal and/or technical knowledge in the issue concerned (if applicable);
 - (d) preferably have had training or prior experience in conducting an investigation.
- 8.6 The investigation should promptly establish the facts and collect all necessary evidence by appropriate means, which may include the following:
- (a) making enquiries to establish the facts;
 - (b) collecting together all relevant documents and other evidence;
 - (c) obtaining witness evidence;
 - (d) where possible and reasonable, requesting reports on the issue to be made in writing and signed by the individuals making them.

Rev. No.	0
Rev. Date	1 Jun 2020
Issued by	QA
Pages	Page 5 of 6

Whistle-blowing Procedures

- 8.7 Once the investigation is completed, the Organisation must implement appropriate follow up actions. Depending on the circumstances and severity of the issue, the follow up actions could include one or more of the following:
- (a) terminating, withdrawing from, or modifying the Organisation's involvement;
 - (b) repaying or reclaiming any improper benefit obtained;
 - (c) disciplining responsible personnel (which, depending on the severity of the issue, could range from a warning for a minor offence to dismissal for a serious offence):
 - (d) reporting the matter to the authorities;
 - (e) taking action to avoid or deal with any possible consequent legal offences (e.g., false accounting which may occur where a bribe is falsely described in the accounts, a tax offence where a bribe is wrongly deducted from income, or money-laundering where the proceeds of a crime are dealt with);
 - (f) review and improve on the Anti-Bribery Management System; and
 - (g) the Organisation may also take disciplinary action if any employee:
 - (i) knowingly makes false or misleading reports about another person; or
 - (ii) acts in a retaliatory, discriminatory or otherwise adverse manner towards a person, as a result of that person making a genuine report or providing assistance in a relevant inquiry; or
 - (iii) intentionally hinders or impedes a formal investigation, or fails to assist the investigator(s) in the investigation; or
 - (iv) knowingly condones attempted/ actual fraud, bribery or corrupt conduct within their areas of responsibility.
- 8.8 The Whistle-Blowing Committee shall keep the Whistle-blower informed on the progress of the investigation (including the outcome of the preliminary investigation to establish a case for further investigation referred to clause 8.4 above) and the conclusion arrived therefrom as soon as a decision is made.
- 8.9 Where required by the Organisation, the Whistle-Blowing Committee shall inform the Organisation and the compliance function of all reports received involving corruption / bribery where it has established that there are merits for an investigation to take place and the outcome therefrom.

	LOJI RAWATAN AIR SG. SELANGOR FASA 1	ABMSP 09	
	ANTI-BRIBERY MANAGEMENT SYSTEM (ABMS) PROCEDURES	Rev. No.	0
		Rev. Date	1 Jun 2020
		Issued by	QA
Whistle-blowing Procedures	Pages	Page 6 of 6	

- 8.10 To ensure that proper procedures have been followed in relation to disciplinary actions (including dismissal) to be taken against any employee arising from an investigation, the Whistle-Blowing Committee should consult the Human Resource and/ or the Legal department to minimise the risk of legal actions instituted by an employee against the Organisation.