



CORPORATE GOVERNANCE WHISTLEBLOWING POLICY

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Ref. No		Version No. : 003
Effective date	29 th June 2015	Rev. Date : 28 February 2018
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1 POLICY STATEMENT

Sedania Innovator Berhad (“the Company”) and its subsidiaries (“the Group”) are 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, the Group provides avenue for all employees of the Group and members of the public to disclose any improper conduct within the Group.

2 OBJECTIVE OF THE POLICY

This policy is to provide an avenue for all employees of the Group and members of the public to disclose any improper conduct in accordance with the procedures 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; and
- vii. Non-Compliance with Procedure.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under the Group’s Code of Conduct & Business Ethics (“CoBE”) or any criminal offence under relevant legislations in force.

This policy is not to invalidate the grievance procedure and/or the disciplinary action process and procedures but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company. The given procedures as reflected in Corporate Disclosure Policies and Procedures and CoBE shall be operative based on the purpose and objective of their existence.

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4 APPLICABILITY OF THE POLICY

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of the Group. This policy also applies to members of the public, where relevant.

5 PROCEDURE IN MAKING A DISCLOSURE

All disclosures are to be channeled in accordance with the procedures as provided in Part II H: Section 32.1 of CoBE.

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 the 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.

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 his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

8 COMMUNICATION AND FEEDBACK CHANNELS

Report(s) can be made verbally or in writing in the following manner:-

- By Letter – to be forwarded in a sealed envelope to the below mentioned designated person labelling with a legend of “To be opened by the Audit and Risk Management Committee Chairman/ Senior Independent Non-Executive Chairman/ Executive Director/ Chief Financial Officer only” (where applicable); or
- By Email – to be forwarded vide secure email to the below mentioned designated person with the heading of “For the eyes of the Audit and Risk Management Committee Chairman/ Senior Independent Non-Executive Chairman/ Executive Director/ Chief Financial Officer only” (where applicable).

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For matters relating to financial reporting, unethical or illegal conduct, one can report directly to the following designated person:-

- (1) Audit and Risk Management Committee Chairman
Datuk Syed Izuan Bin Syed Kamarulbahrin at email address: sizuan@sedaniainnovator.com or
- (2) Senior Independent Non-Executive Chairman
Tan Sri Halim Bin Ali at email address: abdulhalim@sedaniainnovator.com

Postal Address
Level 10, Kelana Parkview Tower, Jalan SS 6/2, 47301 Petaling Jaya, Selangor

For employment-related concerns, one can report directly to the following designated persons:-

- (1) Senior Independent Non-Executive Chairman
Tan Sri Halim Bin Ali at email address: abdulhalim@sedaniainnovator.com or
- (2) Executive Director
En. Noor Syafiroz Mohd Noor at email address: firoz@sedaniainnovator.com or
- (3) Chief Financial Officer
En. Rizalzin Mohammed at email address: rizalzin@sedaniainnovator.com

Postal Address
Level 10, Kelana Parkview Tower, Jalan SS 6/2, 47301 Petaling Jaya, Selangor

9 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.