



WHISTLEBLOWING POLICY

VERSION 2.0

APPROVAL DATE: 25th May 2021

PROCEDURE NO: AZ-SOP-CMP-WB-02

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REVISION HISTORY

REVISION	AMENDMENT	DATE
1.0	New policy and procedure	29 th April 2019
2.0	Revised Whistleblowing Policy	25 th May 2021

1. INTRODUCTION

Ahmad Zaki Resources Berhad (“AZRB” or “the Group”) is committed to achieving the highest standards of professionalism, honesty, fairness, integrity, openness and respect in the conduct of its businesses and operations.

In view of conducting its affairs in an ethical, responsible and transparent manner, the Group provides a mechanism for employees and other stakeholders to voice genuine concerns in relation to any improper conduct within the Group.

2. PURPOSE

The purpose of this policy is to facilitate any whistle-blower to raise concerns through whistleblowing channel about any suspected wrongdoing, bribery or corruption, including but are not limited to the following:

- Incidents of fraud, corruption or bribery;
- Activity which breaches any law or regulatory obligation;
- Breach of the Group’s policies, practices or procedures;
- Improprieties in matters of financial reporting;
- Situation which poses a danger to health, safety or any individual or significant danger to the environment;
- Misuse of confidential information; and
- Any violation of Group Code of Ethics & Conduct.

3. ABBREVIATION AND DEFINITION

AZRB or Company	:	Ahmad Zaki Resources Berhad
AZSB	:	Ahmad Zaki Sdn Bhd
DGMD1	:	Deputy Group Managing Director (1) of Ahmad Zaki Resources Berhad (AZRB)
DGMD2	:	Deputy Group Managing Director (2) of Ahmad Zaki Resources Berhad (AZRB)
GMD	:	Group Managing Director of Ahmad Zaki Resources Berhad (AZRB)
Good faith	:	Evident when the report is made without malice or consideration of personal benefit and the employees or any other persons have a reasonable ground to believe that the report is true. Good faith is lacking when the disclosure is known to be malicious or false
Group	:	Ahmad Zaki Resources Berhad and its subsidiaries
Improper conduct	:	Any conduct that constitutes a wrongdoing or malpractice listed under this Policy including violation of AZRB Code of Ethics and Conduct.
IO	:	Investigation Officer
Policy	:	AZRB’s Whistleblowing Policy
RO	:	Receiving Officer
Stakeholders	:	All employees (whether permanent or contract), Directors, Shareholders, Consultants, Suppliers,

Whistleblower	:	Sub-Contractors, external agencies or any parties who have a business relationship with the Group
	:	The employee or other stakeholder who raises the genuine concerns
Whistleblowing	:	This occurs when an employee or other stakeholder raises a genuine concern about a dangerous or illegal activity or improper conduct that he or she is aware of through his or her work or dealing

4. POLICY AND PROTECTION

4.1 ANONYMITY

It is the policy of AZRB to allow the whistleblower to either identify themselves or if they prefer, to remain anonymous when reporting suspected and/or known instances of wrongdoings.

4.2 ASSURANCE AGAINST REPRISAL AND/OR RETALIATION

Where the whistleblower has chosen to reveal his/her identity, it is the policy of AZRB to provide assurance that the whistleblower would be protected against reprisals and/or retaliation from his/her immediate superior or head of department / division. This is in line with the Whistleblower Protection Act 2010.

In addition, AZRB provides assurance that no disciplinary action can be taken against the whistleblower as long as he/she does not provide false information in the report “purposely, knowingly or recklessly” i.e. the report is basically malicious in nature.

4.3 CONFIDENTIALITY

AZRB shall treat all reports or disclosures as sensitive and will only reveal information on a “need to know” basis or if required by law, court or authority.

The identity and particulars of the whistleblower shall also be kept private and confidential unless the whistleblower chose to reveal his/her identity.

Where the whistleblower has chosen to reveal his/her identity when making such a report, written permission from the whistleblower would be obtained before the information is released.

4.4 IMMUNITY

All costs in relation to any legal liabilities or proceedings (whether criminal or civil) that may be brought against the whistleblower shall be borne by AZRB, and the selection of the lawyer defending the legal action shall be made by the Company.

4.5 PROTECTION

The whistleblower shall also be protected against:

- a) action causing injury, loss or damage;
- b) intimidation or harassment;
- c) interference with the lawful employment or livelihood of the whistleblower, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the whistleblower's employment, career, profession, trade or business or the taking of disciplinary action; and
- d) a threat to take any of the actions referred to in paragraphs (a) to (c) above.

Where necessary, any person related or associated with the whistleblower (i.e. immediate family members) shall be accorded with similar protection mentioned here in paragraph (4.5).

5.0 RECIPIENT

If the whistleblower suspects that wrongdoing, bribery or corruption has occurred, the whistleblower is encouraged to report to the RO, i.e. Chief Compliance Officer (CCO) and Integrity Officer (IO).

6.0 REPORTING CHANNEL

6.1 Report/ disclosure of information can be made through any of the following dedicated channels:

Email address	:	whistleblowing@azrb.com
Phone	:	03-2698 7171 ext. 161
Address	:	Menara AZRB, No.71 Persiaran Gurney, 54000 Kuala Lumpur

6.2 The whistleblower who raises the concern in writing is encouraged to make use the "Report of Wrongdoings" form provided in **Appendix A** to ensure the completeness of the information and must seal the envelope and mark with "**strictly private and confidential**".

6.3 All reports/disclosures made will be dealt strictly in a confidential manner. The whistleblower can remain either anonymous or identify themselves if they prefer.

6.4 The whistleblower is required to provide contact information in his/her report. This is to facilitate the investigator to obtain further information if required and to communicate the result of the investigation.

6.5 Once the disclosure is received from the whistleblower, the RO will initiate preliminary investigations to establish whether the disclosure has merit and can be substantiated.

7.0 EVIDENCE REQUIREMENT

7.1 The whistleblower should or must be able to provide the disclosure in writing on the information on the activity or conduct, the identity of the person(s) suspected and the date and time of the occurrence.

7.2 The whistleblower can include the following evidence with the report such as:

- (a) Photography or video recordings
- (b) Text messages

7.3 Any information obtained from a third party or 'hearsay' will not be entertained and the whistleblower must have first-hand knowledge or information of the disclosure with facts to support the allegations with sufficient evidence.

8.0 PRIVACY ASSURANCE

8.1 The identity and particulars of the whistleblower shall not be revealed unless the whistleblower choose to reveal his/her identity.

8.2 AZRB shall treat all reports or disclosure as sensitive and only reveal the information if required by law, court or authority for the purpose of any proceedings by or against the Group.

8.3 The whistleblower will be given assurance that no disciplinary action shall be taken as long as the whistleblower does not provide false information in the report/disclosure.

9.0 INVESTIGATION PROCESS

9.1 The RO shall receive any reports/disclosure that shall be made through the dedicated channel given by AZRB.

9.2 The dedicated IO shall conduct preliminary investigation to assess the validity of reports/disclosure before full investigation to be conducted.

9.3 The whistleblower shall be protected as stated in para 4.5 during the course of investigation.

9.4 The whistleblower protection shall be revoked if it fits the following criteria;

- a) The whistleblower has participated in the improper conduct.
- b) The report/disclosure made by the whistleblower is deemed to be untrue or false.
- c) The disclosure of improper conduct is frivolous or vexatious.

- d) The whistleblower made the disclosure with the motive of avoiding dismissal or other disciplinary action
 - e) The whistleblower, in due to provide further information, commits an offense of improper conduct.
- 9.5 Upon the completion of the investigation, IO will submit the investigation report to RO.
- 9.6 RO will notify the whistleblower once the investigation report is finalised.

10.0 DECISION MAKING

- 10.1 When the RO have determined whether that the report allegation is substantiated or not, the following tier will determine to decide on the corrective action to be taken and/or disciplinary action to be taken (if any);
- (a) Tier 1(a): In the case of the raised concern is made against the employees of AZSB designated with Senior Manager and below, the report will be submitted directly to DGMD1 for advice and decision making; or
 - (b) Tier 1(b): In the case of the raised concern is made against the employees of AZRB designated with Senior Manager and below, the report will be submitted directly to DGMD2 for advice and decision making; or
 - (c) In the case of the raised concern is made against the employees of AZRB/AZSB designated with Assistant General Manager and above, the report will be submitted directly to GMD for advice and decision making; or
 - (d) If GMD is implicated, the report will be submitted to Senior Independent Director for advice and decision making.
- 10.2 Advice of third-party consultants, Group Legal or regulatory bodies may be obtained, where appropriate.
- 10.3 If the case requires / necessitates further action on the part of Human Resources (HR) Department, a copy of a summary report will be provided to HR Department.
- 10.4 The RO shall prepare a summary report and present it to the Audit and Risk Committee of the Board of Directors of AZRB on a quarterly basis. The report shall maintain confidentiality to protect the whistleblower's identity.
- 10.5 The RO shall maintain a record of the complaints and track their report, investigation and resolution.

REPORT OF WRONGDOINGS

1.	Date and Time of Report	
2.	Details of Alleged Person	
a	Name of person alleged:	
b	Company of person alleged:	
3.	Details of Incident	
a	Incident date and time:	
b	Location of incident:	
c	Details of allegation:	
4.	Details of Whistleblower *	
a	Name:	
b	Contact number**:	
c	Email address:	
d	Company:	

* You may choose to remain anonymous or provide details as per item 4.

** Must be included for further communication and results.