



WHISTLE BLOWING POLICY

**INDAH WATER KONSORTIUM SDN BHD
(Co. No: 211763-P)**



Indah Water
Whistle Blowing Policy

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1.0 PURPOSE

The purpose of this policy is to provide an avenue for all employees of Indah Water Konsortium (IWK) 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.

2.0 SCOPE

This policy applies to the following:

- i) All employees of IWK;
- ii) Contractors and sub-contractors;
- iii) Debt Collection Agencies (DCA);
- iv) Consultants;
- v) All employees/trainees on attachment with IWK;
- vi) Customers;
- vii) Suppliers; and
- viii) Clients/stakeholders and general public

3.0 TOPICS

3.1 Policy Statement

IWK is committed to the highest standard of integrity and accountability in the conduct of its business and operations. It also protects the employees from victimization, harassment or disciplinary action as a result of any disclosure made in good faith.

Recognising the abovementioned commitment, this policy covers situation where an individual (the whistleblower) raises a complaint about a risk, malpractice or wrongdoings that affects others such as customers, suppliers, and other staff or public interest.

3.2 Improper Conducts

This policy facilitates employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Improper conduct include the following:

- i) Fraud;
- ii) Bribery;
- iii) Misuse of Company's property;
- iv) Conflict of Interest;
- v) Abuse of Power;
- vi) Non-compliance with Procedure;
- vii) Any other general malpractice including Security, Health & Safety risks.

The above list is not exhaustive and includes any acts or omissions, which is proven, will constitute an act of misconduct under the Company's Code of Conduct or any criminal offences under the relevant legislations in force.

3.3 Procedure in Making a Disclosure

All disclosure are to be channelled in accordance with the process as provided under this Whistle Blowing Policy. This is described in detail in **Appendix 1 and 2**.

3.4 Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. An employee who whistleblows internally is protected from victimization, harassment or disciplinary action for disclosing any improper conduct committed or about to be committed within IWK, to the extent reasonably practicable, provided that the disclosure is made in good faith.

3.5 Anonymous Whistleblower

Any anonymous whistleblower will not be entertained generally. 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 provide the necessary protection to him. However, the Company reserves the right to investigate into any anonymous disclosure.

3.6 Investigation

IWK reserves the right to investigate into matters disclosed through the prescribed reporting channel. The basis to investigate take into consideration the followings:

- i) Anonymous complaint
- ii) Racial issue
- iii) Religious issue
- iv) General issue that will provoke sensitivity to the employee. E.g., character attack, personal vendetta.

3.7 Notification

Upon completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the procedure.

IWK reserves the right to amend this policy as and when required.

IWK's Whistleblowing Process

Any employee or member of the public whom has knowledge or aware of any improper conduct (misconduct or criminal offence) committed or about to be committed is encouraged to make disclosure by following the process as stated in this document.

1. Reporting Channels

Disclosure can be made to ANY of the following reporting channels, in strict confidential manner:

- I) Email to whistle@iwk.com.my;
- II) Submit Whistle Blowing Form via IWK website, IWK Mobile Application or mail to the Head Integrity Unit;
- III) Direct line at 03-27801295 from Monday to Friday during office hours (9am to 5pm)

2. Disclosure of Identity

In order to enable to Company to accord the Whistleblower with the necessary protection under the Policy and also to obtain more details pertaining to the disclosure, the Whistleblower is required to disclose his/her personal details as follows:-

- I) Name
- II) NRIC No.
- III) Staff ID (for employees only)
- IV) Phone number
- V) Email address

Please see the prescribed form in **Appendix 3**. These personal details will be kept confidential.

3. Scope of Reporting

Only genuine concern should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from any malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.

If the investigation later revealed that the disclosure was made with malicious intent, appropriate action can be taken against the Whistleblower.

The Whistleblower who wishes to withdraw his/her disclosure is required to write to the relevant Reporting Channel and provide reason(s) for the withdrawal. Nevertheless, the Company reserves the right to proceed with investigation on the subject matter of the disclosure.

4. Content of the Disclosure

Any disclosure made herein should contain the following information:

- I) Details of the person(s) involved;
- II) Details of the allegation (as required in Appendix 3);
- III) Other relevant information; and
- IV) Any supporting evidence (documents) if available

5. Protection Accorded to the Whistleblower

A whistleblower will be accorded with protection under the policy 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 procedures involved.

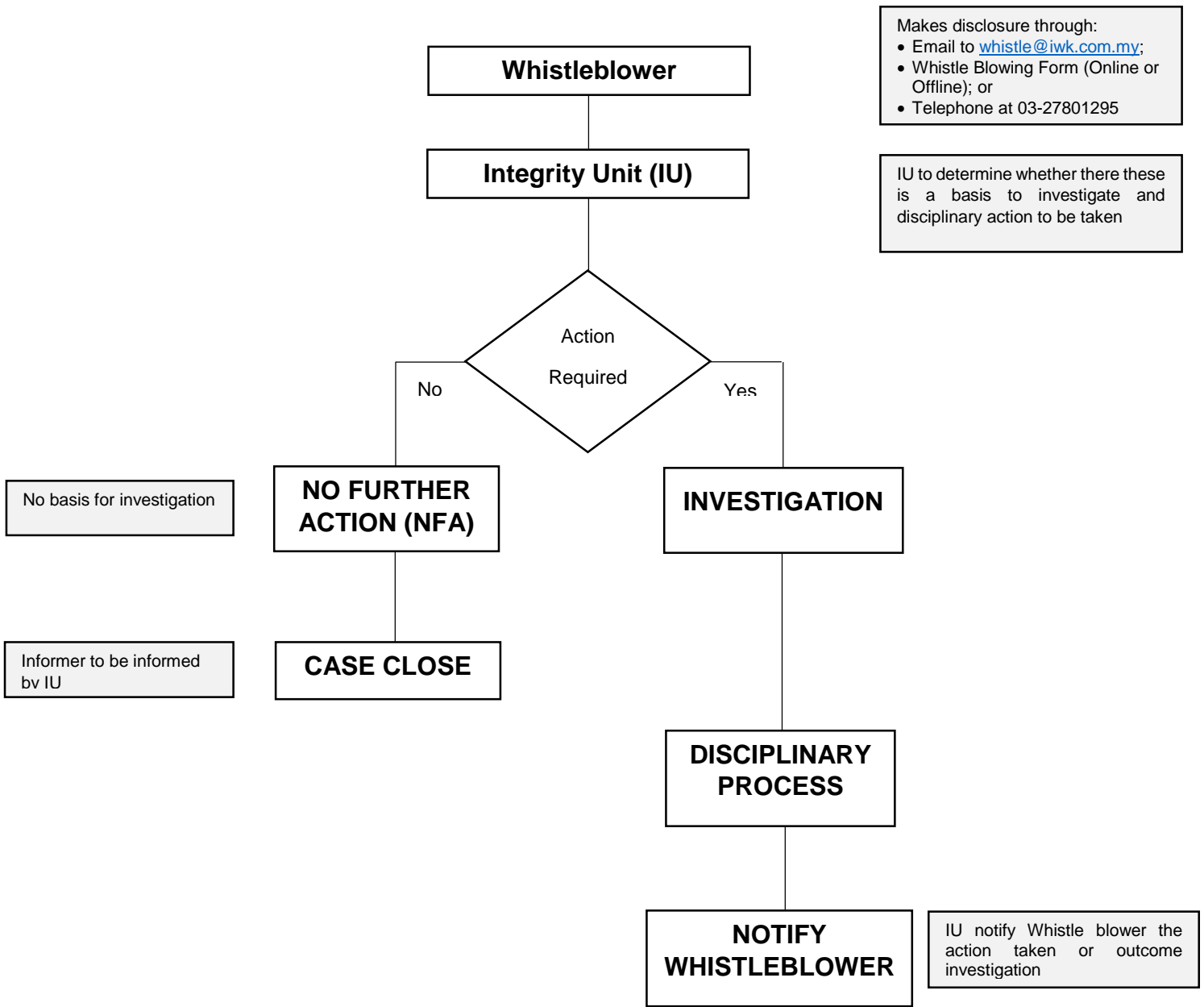
The protection to the Whistleblower can be revoked under the following circumstances, among others;

- I) The Whistleblower participated in the improper misconduct;
- II) The Whistleblower wilfully discloses a false statement;
- III) The disclosure was made with malicious intent;
- IV) The disclosure is frivolous or vexatious; or
- V) The Whistleblower reveals his/her identity on own accord.

6. Notification on the outcome of the Disclosure

The Whistleblower will be notified on the outcome of his/her disclosure.

WHISTLEBLOWING FLOWCHART



WHISTLEBLOWER GUIDE

Please be informed that Indah Water Konsortium Sdn Bhd ("IWK") reserves the right to proceed with investigation on the subject matter of the disclosure. Whistleblower who uses someone else's identity (Name, NRIC, Staff ID, Contact Number, Email Address) will not be entertained and if committed by IWK's staff, will be subjected to disciplinary action.

Reporting anonymously without sufficient information is strongly discouraged due to the difficulty in obtaining evidence to corroborate the alleged improper activities before the investigation commences. Please provide the required information of the improper activities as prescribed in the form below.

GUIDELINE	
Who?	Who did the wrongdoing? Who is involved? Their position/scope of work and which Unit Office or Department do they report to? Who else knows about the improper activities? Who can and would confirm that they occurred? How can we reach this witness?
What?	What wrongdoing occurred? What specifically the suspect do? What is wrong with it? What kinds of documents would provide evidence of the improper activities? Where are the documents located? Who controls them?
Where?	Where did this happened? Kindly provide specific location (Unit/Plant)
When?	When did the improper activity occur? Is it ongoing? How frequently has it occurred?
Why?	What are the suspect(s) motives? For example, how does the suspect benefit from the improper activities? If others benefit from the activities, who are they and how do they benefit?
How?	How did the wrongdoings occur? Was there a lack of controls, circumvention of controls, or collusion with other individuals?

Please enclose completed form in an envelope marked "Confidential" and "to be open by addressee only" and mail to:

<p>Head Integrity Unit, INDAH WATER KONSORTIUM SDN. BHD. No 44, Jalan Dungun, Damansara Heights, 50490 Kuala Lumpur</p>
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Or, email this attachment to: whistle@iwk.com.my

WHISTLEBLOWER FORM

Whistleblower's Contact Information (Required)			
Name			
NRIC			
Staff ID (for employees only)			
Contact Number		Email Address	
Details of Disclosure			
Suspect's Information			
Name			
Designation			
Unit/Dept			
Contact Number		Email Address	
Witness(es)' Information (if any)			
Name (1)			
Unit/Dept			
Contact Number:		Email Address	
Name (2)			
Unit/Dept			
Contact Number:		Email Address	
Complaint			
<i>Briefly describe the misconduct/improper activity and how you got to know about it. Please provide as much information by specifying what, who, when, where and how. If there is more than one allegation, number each allegations. You may use as many pages as necessary. Please use the Guideline above to help you describe the improper activity in details.</i>			
1. What misconduct/improper activity occurred?			

2. Who committed the misconduct/improper activity?

3. When did it happen and when did you notice it?

4. Where did it happen?

5. Is there any evidence that you could provide us?

6. Are there any other parties involved other than the suspect stated above?

7. Do you have any other details or information which could assist us in the investigation?

Evidence/Supporting Document(s)

Please provide evidence or supporting documents to substantiate your disclosure (if any) to facilitate investigation. You may also attach relevant documents.

Declaration (Required)

I hereby declare that all the information given herein are made voluntarily and true to the best of my knowledge. I will ensure that my participation in this matter will be kept confidential. I do understand that Indah Water Konsortium Sdn. Bhd. will use the information and material(s) provided in the course of managing the disclosure/complaint.

Signature

Name

Date

Note: Complaints from Whistleblower who uses someone else's identity (Name, NRIC, Staff ID, Contact Number, Email Address) will not be entertained and if committed by IWK's staff, will be subjected to disciplinary action.