

# SENTORIA

*Build a Better Tomorrow*

## **SENTORIA GROUP BERHAD**

*[Company Registration No. 199801007217 (463344-K)]*

# **WHISTLE BLOWING POLICY & PROCEDURE**

*Approved by the Board on 31 January 2024*

## **CONTENTS**

<b>1. PURPOSE.....</b>	<b>1</b>
<b>2. POLICY.....</b>	<b>1</b>
<b>3. PROCEDURE.....</b>	<b>2</b>
<b>4. INVESTIGATION PROCEDURE.....</b>	<b>2</b>
<b>5. PROTECTION &amp; CONFIDENTIALITY.....</b>	<b>3</b>
<b>6. UNTRUE ALLEGATIONS.....</b>	<b>3</b>
<b>7. ACKNOWLEDGEMENT &amp; RECOGNITION .....</b>	<b>3</b>

## **1. PURPOSE**

- a) Sentoria is committed to achieving and maintaining the highest standards of openness, integrity and accountability in the conduct of its businesses and operations. Employees at all levels are expected to conduct themselves with integrity, impartiality and honesty.
- b) Whistle Blowing is a specific means by which an individual, whether employee or otherwise (hereinafter referred to as the Reporting Individual), can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.
- c) The term 'whistle blowing' refers to a situation where the Reporting Individual decides to report serious concerns about any malpractice which he/she has become aware or genuinely suspects that Sentoria has been or may become involved in. This policy is designed to encourage the Reporting Individual to raise serious concerns internally, without fear of reprisal or victimization, in a responsible and effective manner rather than overlooking a problem or blowing the whistle outside.

## **2. POLICY**

- a) This policy is intended to assist the Reporting Individual to disclose internally and at a high level, information which the Reporting Individual believes shows malpractice or impropriety. It is not designed to further any personal disputes, question financial or business decisions taken by Sentoria nor should it be used to reconsider any staff matters which have been addressed under the grievances procedure already in place. Whistle blowing matters may include but are not confined to:-
  - Fraud
  - Bribery
  - Abuse of power
  - Breach of legal or regulatory requirements
  - Theft, criminal offences, breach of civil law and miscarriage of justice
  - Conflict of interest
  - Endangerment of the health and safety of an individual
  - Damage caused to the environment
  - Violation of rules of conduct applicable within Sentoria
  - Improper conduct or unethical behavior likely to prejudice the standing of Sentoria
  - Deliberate concealment of any of the above
- b) Only genuine concerns should be reported. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct (where the Reporting Individual is an employee) and if proven, may lead to dismissal.
- c) Any anonymous disclosure will not be entertained. All Reporting Individual 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.

### 3. PROCEDURE

#### a) Reporting Channel

Where the Reporting Individual is an employee, any concern should be raised with the immediate superior. The immediate superior should then raise the matter with the management as appropriate i.e. Head of Department (HOD), Head of Human Resource (HR Manager), Joint Managing Director (JMD) or the Group Chief Executive Officer (Group CEO).

Where the Reporting Individual is not an employee of Sentoria, his / her concern must be raised with the HR Manager, JMD or Group CEO.

The channels of reporting are as follows:

Name/Title	Address	Email	Tel Number
HR Manager	No. 56 & 58, Jalan Dagang SB 4/2, Taman Sg. Besi Indah, 43300 Seri Kembangan, Selangor.	<a href="mailto:hr@sentoria.com.my">hr@sentoria.com.my</a>	03-8943 8388 Ext 403
Dato' Chan Kong San ("JMD")	No. 56 & 58, Jalan Dagang SB 4/2, Taman Sg. Besi Indah, 43300 Seri Kembangan, Selangor.	<a href="mailto:jimmy@sentoria.com.my">jimmy@sentoria.com.my</a>	03-8943 8388 Ext 402
Dato' Gan Kim Leong ("JMD")	No. 56 & 58, Jalan Dagang SB 4/2, Taman Sg. Besi Indah, 43300 Seri Kembangan, Selangor.	<a href="mailto:klgan@sentoria.com.my">klgan@sentoria.com.my</a>	03-8943 8388 Ext 401
Dato' Loh Yuen Tuck ("Group CEO")	No. 56 & 58, Jalan Dagang SB 4/2, Taman Sg. Besi Indah, 43300 Seri Kembangan, Selangor.	<a href="mailto:ceo@sentoria.com.my">ceo@sentoria.com.my</a>	03-8943 8388 Ext 409

#### b) Reporting Form

A whistle blowing form is included in **Appendix 1**. Please refer.

### 4. INVESTIGATION PROCEDURE

#### a) The format and the length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may:-

- be investigated internally;
- be referred to the Police;
- be referred to the External Auditor; and/or
- form the subject of an independent inquiry.

- b) The JMD / Group CEO or the person designated to investigate the complaint will write to the Reporting Individual wherever reasonably practicable of the concern being received, for the following purposes:-

- acknowledging that the concern has been received;
- advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be;
- giving an estimate of how long the investigation will take to provide a final response; telling the Reporting Individual whether any initial enquiries have been made, and whether further investigations will take place, and if not, why not.

## **5. PROTECTION & CONFIDENTIALITY**

- a) It is Sentoria's policy that the Reporting Individual should not suffer any form of intimidation, reprisal, retaliation or adverse reaction organizationally as a consequence of reporting a concern about any of the matters mentioned in paragraph 2(a).
- b) Sentoria will make every effort to treat all disclosures in a confidential and sensitive manner.
- c) The identity of the Reporting Individual making the allegation will not be divulged without his / her consent. However, there may be circumstances in which Sentoria may be required or legally obliged to reveal the Reporting Individual's identity, for example, where an investigation leads to legal proceedings being initiated. If this is the case, Sentoria will take all reasonable steps to ensure that the Reporting Individual suffers no detriment. Harassment or victimization of a genuine whistle blower will not be tolerated.

## **6. UNTRUE ALLEGATIONS**

In making a disclosure, the Reporting Individual should exercise due care to ensure the accuracy of the information. Where the Reporting Individual is an employee and he/she is mistaken, he/she will not be at risk of losing his/her job or suffer any form of retribution as a result, provided that he/she is acting in good faith. On the other hand, disciplinary action will be taken against employee deliberately raising false and malicious allegations. In an extreme case vexatious or wild allegations could give rise to legal action on the part of the persons complained about.

## **7. ACKNOWLEDGEMENT & RECOGNITION**

Sentoria places great value upon creating an environment where employees would maintain the highest standard of ethics, honesty, openness and accountability. Sentoria recognizes that it requires courage and personal quality such as righteousness, loyalty and impeccable integrity for an employee to step out and blow the whistle. These personal qualities and positive behaviours demonstrated by the whistleblowers are well acknowledged by Sentoria and will be taken into consideration, among others, for the employee's career opportunities and advancement.

For whistleblowers who are non-employees, Sentoria also records its sincere appreciation for taking the effort to raise the concern so that the management may take actions as appropriate.

## WHISTLE BLOWING FORM

STRICTLY CONFIDENTIAL

(\*) Denotes mandatory field

**1 Your Contact Information**

Name \*

NRIC Number \*

Phone Number \*

Office

Mobile

Home

Email Address \*

Employment Details \*

*(for employees only)*

Division, Department, Position

**2 Details of Concern \***

Please indicate here, a summary of your concern. You should include details of what your concern is; who is / are involved; why you are concerned; when did the concern arise; if there are other people who can verify your concern. (Use additional sheets if necessary).

**3 Evidence**

Please state the supporting documents, witnesses or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant documents. (Use additional sheets if necessary).

## WHISTLE BLOWING FORM

**STRICTLY CONFIDENTIAL**

### 4 Declaration \*

I hereby declare that all the information given herein are made voluntarily and are true to the best of my knowledge and I will ensure that my participation in this matter will be kept confidential. I do understand that SENTORIA will use the information and material provided throughout the process.

\_\_\_\_\_  
(Signature)

Name:

Date:

#### **Instruction to whistle-blower**

If you are an employee, you should send this form to your immediate superior, unless he / she is the subject of complaint, then it should be passed to the HR Manager / JMD / Group CEO.

If you are not an employee, please send this form to the HR Manager / JMD / Group CEO.

You will be contacted by a senior member of staff, who will confirm the process to be followed and agree how you are to be contacted in future. Whilst we shall try to keep your name as confidential as possible, please be aware that it may well be necessary to reveal it as part of the investigation process.

Received by: \_\_\_\_\_

Date: \_\_\_\_\_