



# WARISAN TC HOLDINGS BERHAD

Registration No. 199701009338 (424834-W)

## SPECIAL COMPLAINT POLICY

	<b>Designation</b>	<b>Date</b>
<b>Approved By:</b>	Board of Directors of Warisan TC Holdings Berhad Board of Directors of Warisan TC Holdings Berhad	26 Feb 2013 1 June 2020
<b>Initiate/Revision Date:</b>	26 February 2013 1 June 2020	Revision: 0 Revision: 1



## SPECIAL COMPLAINT POLICY

<b>TITLE:</b> Special Complaints Policy	<b>Date:</b> 26 February 2013	<b>Revision:</b> 0
	<b>Date:</b> 1 June 2020	<b>Revision:</b> 1

## SPECIAL COMPLAINT POLICY

### 1. Preamble

As part of the initiatives to support the mitigation of the risk of corruption, malpractices and other wrongdoings, a Special Complaint Policy (“Policy”) has been established to protect whistleblowers who are either employees, suppliers, vendors, customers or any other stakeholders of Warisan TC Holdings Berhad (“WTCH”) and its subsidiaries, jointly controlled companies and associated companies (“WTCH Group”)

The Policy provides a procedure that allows and facilitates the whistleblowers to report anonymously and confidentially on any improper conduct without fear of any detrimental action. For the purpose of this Policy, the terms “improper conduct” and “detrimental action” shall have the same meaning as assigned under the Whistleblower Protection Act 2010.

### 2. Reporting on Improper Conduct

Whistleblowers are encouraged to raise concerns regarding any improper conduct such as corruption, abuse of power, malpractices and/or irregularities, and other wrongdoings. Improper conduct shall include but not limited to reporting of fraudulent financial information, actual or suspected fraud, misappropriation of monies, misrepresentation, concealment of facts or information with intention to mislead, violation of WTCH Group’s Code of Business Conduct and Ethics, laws and regulations, endangerment of employees or public health and safety, violation of WTCH Group’s policies, taking or giving kickbacks, bribes, favours, privileges, criminal offence and blackmailing. Whistleblowers may raise and submit their concerns via the reporting channels as provided in Appendix 3.

A report of any improper conduct may be made by any whistleblower that has knowledge of such improper conduct committed by any person of the WTCH Group.

Action shall be taken on such complaint, please refer to the flowchart in Appendix 1.



## SPECIAL COMPLAINT POLICY

<b>TITLE:</b> Special Complaints Policy	<b>Date:</b> 26 February 2013	<b>Revision:</b> 0
	<b>Date:</b> 1 June 2020	<b>Revision:</b> 1

If the outcome results in a proven case of improper conduct and confirms the allegations, disciplinary action or any other actions shall be instituted against the related person for such improper conduct in accordance with WTCH Group's policy.

### **3. Acting in Good Faith**

A whistleblower, who files a complaint concerning an improper conduct, must be acting in good faith and not for personal gain or motivation, and has reasonable grounds for believing the information disclosed indicate such violation.

Any whistleblower, who has not acted in good faith and his/her allegations are proved to be unsubstantiated and/or made with malicious intent, shall not be entitled to any protection under this Policy, and may be subject to any appropriate action in accordance with WTCH Group's policy and where such whistleblower is an employee of the WTCH Group, he/she will be subject to disciplinary action (which may include termination of employment).

### **4. Protection Against Detrimental Action**

No person shall take detrimental action against a whistleblower or any person related to or associated with the whistleblower in reprisal for reporting an improper conduct in good faith.

For any employee or officer of the WTCH Group who have committed any detrimental action against the whistleblower or any person related to or associated with the whistleblower for reporting an improper conduct in good faith, he/ she can be subject to disciplinary action up to and including termination of employment.

### **5. Making a Report**

All disclosed information, including the identity of the whistleblower shall be treated with strictest confidence.

For whistleblowers who are not willing or not able to provide their names when submitting a report; this Policy permits and recognizes complete anonymity and without prejudice on the part of the investigator.



## SPECIAL COMPLAINT POLICY

<b>TITLE:</b> Special Complaints Policy	<b>Date:</b> 26 February 2013	<b>Revision:</b> 0
	<b>Date:</b> 1 June 2020	<b>Revision:</b> 1

### 6. Validity of this Policy

Until there is any change in or replacement of the Policy that is approved by the Board of directors of WTCH, this current Policy shall remain valid and is an official document for WTCH Group.

#### **Attachment:**

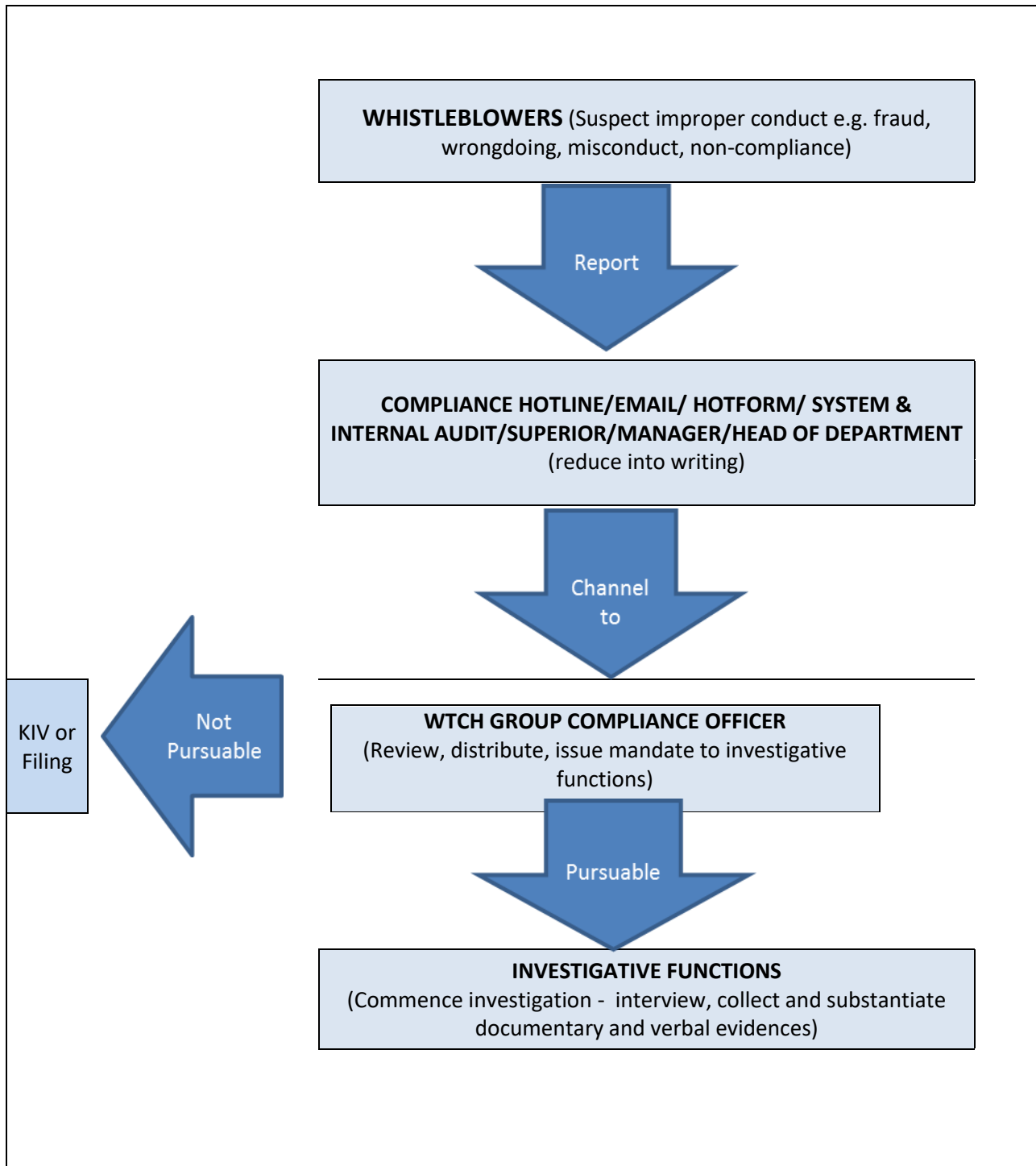
- Appendix 1: Special Complaint Flowchart
- Appendix 2: Complaint Report (template)
- Appendix 3: Contact Details



## SPECIAL COMPLAINT POLICY

<b>TITLE:</b> Special Complaints Policy	<b>Date:</b> 26 February 2013	<b>Revision:</b> 0
	<b>Date:</b> 1 June 2020	<b>Revision:</b> 1

### Appendix 1: Special Complaint Flowchart





## SPECIAL COMPLAINT POLICY

<b>TITLE:</b> Special Complaints Policy	<b>Date:</b> 26 February 2013	<b>Revision:</b> 0
	<b>Date:</b> 1 June 2020	<b>Revision:</b> 1

### Appendix 2: Complaint Report

### WARISAN TC HOLDINGS BERHAD COMPLIANCE HOTFORM

PART A – Details of Person Alleged			
Name			
Designation/Department /Other			
Subsidiary/Company/Other			
PART B – Alleged Incident details (you may attach additional pages)			
(Please attach any evidence or document, if any that will support your allegation/complaint)			
Date of this report	(dd)	(mm)	(yy)
PART C – Details of Parties mentioned in Part B, if available			
Party #1			
Name			
Phone			
Email			
Party #2			
Name			
Phone			
Email			



## SPECIAL COMPLAINT POLICY

<b>TITLE:</b> Special Complaints Policy	<b>Date:</b> 26 February 2013	<b>Revision:</b> 0
	<b>Date:</b> 1 June 2020	<b>Revision:</b> 1



### Your contact details



**Name:**

**Contact:**

**Email:**

### Confidentiality and Protection Against Detrimental Action

You are encouraged to provide your identity when a report or disclosure is made to facilitate easy follow-up and clarifications if and when required. Under the Company's Special Complaint Policy, your identity and information received shall be kept confidential. The Company will not tolerate any detrimental action against you and will take appropriate action to protect you if you raise the concern in good faith. Any party that takes any detrimental action against the person who has reported any improper conduct in good faith may be subjected to appropriate disciplinary action, up to and including dismissal or legal action, where applicable.

### Acting in Good Faith

However, a person who files a complaint concerning an improper conduct must be acting in good faith and have reasonable grounds for believing the information disclosed is true. Any allegations that proved to have been made with malicious intent will be subjected to appropriate action, up to and including legal actions, where applicable.

<i>Office Use Only</i>		
<b>Received by</b>	<b>Name:</b>	
	<b>Date:</b>	
<b>Complaint Ref #:</b>		
<b>Concerns warrant further investigation?</b>	No ( )	Yes ( )
<b>Feedback to Complainant/Whistleblower (if requested)</b>	<b>Date:</b>	



## SPECIAL COMPLAINT POLICY

<b>TITLE:</b> Special Complaints Policy	<b>Date:</b> 26 February 2013	<b>Revision:</b> 0
	<b>Date:</b> 1 June 2020	<b>Revision:</b> 1

### Disclaimer

Warisan TC Holdings Berhad Group has the right to reroute all complaints submitted to respective channel within the Group for further action.

### Appendix 3 – Reporting Channels/ Details

Mode	Description
E-mail	<a href="mailto:compliance@warisantc.com">compliance@warisantc.com</a>
WTCH Group's Compliance Hotline	1800-888-245
WTCH Group's Compliance Hotform (as provided in Appendix 2)	<a href="http://www.warisantc.com.my/">http://www.warisantc.com.my/</a>