

SARAWAK CABLE BERHAD WHISTLEBLOWING POLICY

1. Policy Statement

- 1.1 Sarawak Cable Berhad (“SCABLE” or “the Company”) is committed to achieve and maintain a high standard of integrity and accountability in the conduct of businesses and operations. The Company aspires to conduct its affairs in an ethical, responsible and transparent manner.
- 1.2 In tandem with the recognition of the abovementioned values, SCABLE provides an avenue for all employees and members of the public to disclose any improper conduct, illegal acts and unethical behaviour that may happen in SCABLE Group.
- 1.3 Generally, a whistleblower is an insider of an organisation (e.g. employee, consultant or vendor) who reports improper conduct that has occurred within that same organisation. In an effort to encourage whistleblowers to come forward with information on any alleged improper conduct, the Whistleblower Protection Act 2010 provides safe avenues for them to make disclosures of such alleged improper conduct (whistleblowing) to the relevant authorities in good faith, by protecting their identities, providing them with immunity from civil and criminal proceedings and protecting them from detrimental action.
- 1.4 To improve corporate governance, this policy and procedures is applicable to all companies within SCABLE Group.

2. Scope of the Policy

This policy is designed to facilitate employees and members of the public to disclose any misconduct or criminal offences through an internal channel. The misconduct or criminal offences include but not limited to the following:

- Corruption, bribery and fraud;
- Criminal offence or breach of laws in Malaysia or overseas;
- Conflict of interest;
- Abuse of Power;
- Theft of Company’s Property;
- Misuse of Company’s Property;
- Misappropriation of Company’s funds;
- Act or omission jeopardising the health and safety of employees;
- Improper or unethical conduct or behaviour;
- Sexual harassment;
- Assisting a person to commit any of the above instances of improper conduct; and

- Detrimental action taken against whistleblowers or persons closely associated with whistleblowers.

It is advisable for a potential whistleblower to consider whether the alleged improper conduct to be disclosed to the Company falls within any of the above, prior to making the disclosure. The potential whistleblower should also consider whether the intended disclosure is specifically prohibited by any such written law.

3. Reporting Procedure & Channel

All disclosures are to be channelled in accordance with the procedures as outlined below:

- a) If any employee believes reasonably and in good faith that malpractices exist in the work place, the employee should inform or report the matter to the department manager first. The employee may also choose to report by filling out the Google Form available at the URL link below:

<http://bit.ly/scablewhistleblower>

- b) Whistleblowers are advised to make their disclosures in writing (via the Google Form) and to provide sufficient details which include the following:
 - the type or description of improper conduct;
 - the name of individuals who have committed or are involved in the improper conduct; and
 - the ‘how’, ‘what’, and ‘where’ in relation to the improper conduct including supporting documents or evidence, if any.

4. Disclosure of Identity

The whistleblower(s) is required to disclose his/her personal details as follows:

- Full name;
- N.R.I.C. number;
- Telephone contact number; and
- Email Address.

5. Protection Accorded to the Whistleblowers

A whistleblower will accord with protection under the Policy provided the disclosure is made in good faith. Such protection is accorded even if the investigation reveals that the whistleblower has mistaken as to the facts and the rules and procedures involved.

The following protections will be accorded to a whistleblower who makes a disclosure of improper conduct to the Company in good faith:

- confidentiality of identity;
- immunity from civil and criminal liability for the disclosure made; and
- protection from detrimental action.

The Company reserves the right to revoke protection pursuant to section 11 of the Whistleblower Protection Act 2010 under the following circumstances:

- the whistleblower participated in improper conduct;
- the whistleblower wilfully discloses a false statement;
- the disclosure is made with malicious intent;
- the disclosure is frivolous or vexatious;
- the disclosure is known to the whistleblower to be false or untrue;
- the disclosure is made solely or substantially to avoid dismissal or other disciplinary action; or
- where the whistleblower commits an offence under the Whistleblower Protection Act 2010.

Any person who makes a disclosure of improper conduct to the Company, knowing or believing that any material statements in the disclosure is false or untrue commits a criminal offence under the Whistleblower Protection Act 2010.

6. Investigation Procedures

6.1 The receiver of the report or Person-in-Charge (“PIC”) will respond to the reported cases promptly. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, the PIC will make initial inquiries to decide whether an investigation is appropriate, if so, what form it should take. The overriding principle for the PIC will be in the best interest of the Company and the public at large.

6.2 SCABLE may carry out investigation in the following manner:

- Independent inquiry by the appointed PIC;
- Refer the case to Internal Auditors;
- Refer the case to External Auditors; or
- Refer the case to police and/or other relevant authorities.

7. Confidentiality

All cases reported will be treated with confidentiality and every effort will be made not to reveal the whistleblower’s identity. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without the whistleblower’s help, so the whistleblower may be asked to come forward as a witness.

The whistleblowers are not expected to prove beyond the truth of their suspicion and they will need to demonstrate to the PIC that they have a genuine concern relating to suspected wrongdoing or malpractice within the SCABLE Group and there are reasonable grounds of their concern.

8. Acknowledgement of Notification and Reward

SCABLE recognises loyalty and contribution by creating a present environment where employees would maintain a high standard of ethics, honesty, openness and accountability. Management will acknowledge the positive and constructive feedback demonstrated by whistleblowers.

Management will take into consideration, among others, the employees' career opportunities and advancement. In addition, SCABLE has the discretion to reward whistleblowers monetarily on a case-to-case basis.