

# PROCEDURES OF STEEL HAWK WHISTLEBLOWING POLICY

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

## Reporting Channels

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



Email to [steelhawk-wb@bdo.my](mailto:steelhawk-wb@bdo.my); or



Online submission through [website](#) or QR scan.



## Disclosure of Identity

In order to enable the 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 encouraged to disclose his/her personal details as follows:-

- i. Name;
- ii. Contact Details - Contact number and/or Email

These personal details will be kept confidential.

## Scope of Reporting

Any improper conduct (misconduct or criminal offence) including but NOT limited to the following:

- Fraud;
- Bribery;
- Abuse of Power;
- Conflict of Interest;
- Theft or embezzlement;
- Misuse of Company's Property;
- Non Compliance to Procedure.

Only genuine concerns 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.

Any acts of Bribery, including *failure to report*, shall constitute as a serious misconduct and offence and shall be subjected to the provision of MACC Act 2009.

## Content of the Disclosure

Any disclosure made herein should contain the following information:

- Details of the person(s) involved;
- Details of the allegation
  - Nature of the allegation;
  - Where and when the alleged misconduct/wrongdoing took place;
- Other relevant information; and
- Any supporting evidence if available.

## 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 and procedures involved.

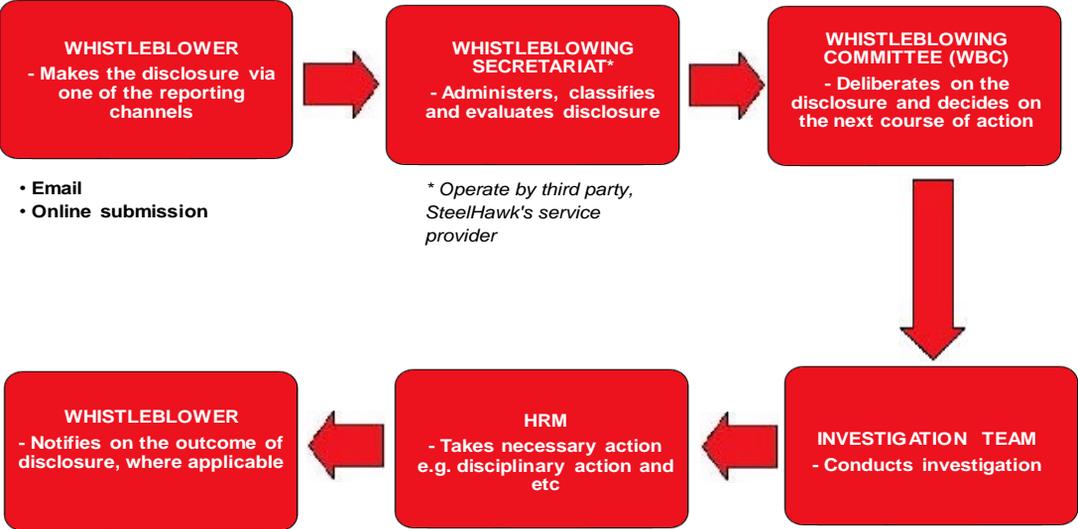
The protection to the Whistleblower can be revoked under the following circumstances, among others:-

- the Whistleblower participated in the improper conduct;
- the Whistleblower wilfully discloses a false statement;
- the disclosure is made with malicious intent; or
- the disclosure is frivolous or vexatious.

## Notification on the Outcome of the Disclosure

The Whistleblower will be notified on the outcome of his/her disclosure, provided that the contract details are made available.

# Process of Making Disclosure



**STEEL HAWK reserves the right to amend the procedures contained in this document from time to time.**