




Prasarana Malaysia Berhad (467220-U)

WHISTLEBLOWING POLICY

FOR REFERENCE ONLY

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DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 2 of 13	

REVISION HISTORY			
REVISION NO.	EFFECTIVE DATE	AFFECTED PAGE(S)	CHANGE DESCRIPTION
0	16 July 2019	All	To align with Integrated Management System (IMS) requirement
1	23 October 2023	All	Revision pursuant to the approved revised whistleblowing process by the Main Board

FOR REFERENCE ONLY


DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 3 of 13	

TABLE OF CONTENTS

PURPOSE STATEMENT..... 4

GLOSSARY 5

GENERAL..... 6

Reference..... 6

Updating the Policy 6

1.0 INTRODUCTION 7

Vision..... 7

Policy Statement 7

Purpose 7

Scope 8

2.0 REPORTING METHODS 9


3.0 PROTECTION 10

4.0 REPORTING A CONCERN 11

5.0 OVERSIGHT AND OWNERSHIP OF POLICY..... 12

Appendix 1 – Governance Matrix..... 13


FOR REFERENCE ONLY

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 4 of 13	

PURPOSE STATEMENT

This Policy is to provide a proper mechanism for all employees of Prasarana and members of the public to report concerns on any improper misconduct that is in violation of the code of conduct, actual or suspected misconduct, illegal or unethical behaviour without fear of retaliation or unfair treatment so long as there is reasonable basis for the concern and the disclosure is made in good faith.


FOR REFERENCE ONLY

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 5 of 13	

GLOSSARY

NO.	TERMS	DESCRIPTION
1	BRCGC	Board Risk Compliance Governance Committee
2	CEO	Chief Executive Officer
3	CIO	Chief Integrity Officer
4	Prasarana	Prasarana Malaysia Berhad
5	PGCEO	President & Group Chief Executive Officer
6	SOP	Standard Operating Procedure

FOR REFERENCE ONLY

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 6 of 13	

GENERAL

Reference


Whistleblower Protection Act 2010

Updating the Policy

The responsibility of updating this Policy remains with Integrity Governance Department in collaboration with Document Controller and it shall be reviewed as and when required, with approval from the Board.

End of Section

FOR REFERENCE ONLY

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 7 of 13	

1.0 INTRODUCTION

Vision

At Prasarana Malaysia Berhad (“Prasarana”), our corporate values “(InFORM)” guide us in all our actions – from strategic decisions to day-to-day interactions with customers and one another:


1. **In** : Integrity and Honesty – Ethical and professional in all our dealings. “I always do the right thing.”
2. **F** : Freedom through responsibility – Empowered to do the right thing every time and be accountable for our actions. “I value the trust given to me.”
3. **O** : Openness – Broadminded, impartial and receptive in our interactions. “I am approachable.”
4. **R** : Resourcefulness – Always looking for better ways to do things. “I do better everyday.”
5. **M** : Mutual Respect – Treat others the way you wish to be treated. “I appreciate everyone.”

Policy Statement

Prasarana Malaysia Berhad (“Prasarana”) is committed to upholding the highest standard of integrity in the conduct of its businesses and operations in line with its corporate values. It conducts its affairs in an ethical and responsible manner. As part of this commitment, Prasarana has in place an avenue for reporting of any improper misconduct. This Policy is also applicable to Prasarana’s subsidiaries.

Purpose

This Policy is to provide a proper mechanism for all employees of Prasarana and members of the public to report concerns on any improper misconduct that is in violation of the code of conduct, actual or suspected misconduct, illegal or unethical behaviour without fear of retaliation or unfair treatment so long as there is reasonable basis for the concern and the disclosure is made in good faith.


DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 8 of 13	

Scope

Below are examples of misconduct related to Prasarana business practices and non-compliances relating to but not limited to:

- (a) Abuse of Power;
- (b) Non-Compliance with Accounting Standards and Processes, Internal Controls, Auditing, or IT Controls;
- (c) Any Other Breach of Company Policies;
- (d) Engagement in Acts of Bribery and Corruption;
- (e) Breaches of Data Confidentiality and/or Privacy;
- (f) Engagement in Any "Conflict of Interest" Act;
- (g) Engagement in Acts of Fraud or Breach of Trust;
- (h) Gifts, Sponsorships, Donations, Entertainment, and Hospitality in Breach of Company Policy;
- (i) Harassment, Bullying, and Sexual Misconduct;
- (j) Non-Compliance with Health, Safety, Security, and Environment Acts and Regulations;
- (k) Misappropriation of Company Assets;
- (l) Misuse of Social Media or Business Communications;
- (m) Retaliation Against Whistleblower;
- (n) Engagement in Substance Abuse or Drugs;
- (o) Theft or Misuse of Resources; and
- (p) Violation of Any Other Law and Regulation

End of Section

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 9 of 13	

2.0 REPORTING METHODS

- 2.1 There are two (2) reporting methods to report any concerns of a serious nature about the conduct of Prasarana or its employees. One (1) method is via email and another method is via an anonymous digital mobile app or web portal.
- 2.2 To report any concerns of a serious nature, please email to integrity.prasarana@prasarana.com.my Whistleblowers are encouraged to include the following information in their report:
- Whistleblower's name and contact details (telephone number and email address) (This is encouraged however Whistleblower can opt to remain anonymous);
 - Details of the allegation including where and when the alleged misconduct had taken place;
 - Details of the person(s) involved;
 - Details of witnesses (if any); and
 - Any other relevant information and supporting evidence if available.
- 2.3 To anonymously report any concerns of a serious nature, you may download the Speeki™ mobile app to any mobile device using the following QR code:




You may also report via the web portal using the following URL:

prasarana.portal.speeki.com

Follow all prompts and wherever prompted for a company name or company code please enter "Prasarana". Please note all information will remain confidential and anonymous, but if you choose to reveal your identifying information you will receive the protection as outlined in section 3 of this policy.

End of Section

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 10 of 13	


3.0 PROTECTION

3.1 Whistleblower Protection

Prasarana will accord protection to the extent it is able to do so under the provision of the Whistleblower Protection Act 2010. This includes protection against any adverse and detrimental actions for disclosing any misconduct committed or about to be committed within Prasarana to the extent reasonably practicable provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken about the facts, rules and procedures involved.

End of Section


FOR REFERENCE ONLY

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 11 of 13	

4.0 REPORTING A CONCERN

- 4.1 When a concern is raised, it will be treated seriously, fairly and promptly.
- 4.2 The concern will be assessed based on the information provided by the Whistleblower and thus an initial inquiry will be made. If initial inquiry indicates further investigation is necessary, a thorough investigation into the concern will be performed. Upon completion of the investigation, an investigation report shall be prepared, submitted and deliberated accordingly with the relevant stakeholders as per outlined Governance Matrix in Appendix 1.
- 4.3 Consequence management including disciplinary actions shall be meted out in accordance with applicable policies and Standard Operating Procedures (SOPs) i.e. “Prasarana Code of Business Ethics”, “Consequence Management Guideline” and/or other relevant policies documented and monitored. If the findings reveal a potential criminal offense, the matter will be escalated to the Board of Directors for deliberation. Depending on the results of the investigation, any criminal matters will be reported to the police or the relevant regulatory body/authorities if required by the applicable law.

End of Section

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 12 of 13	


5.0 OVERSIGHT AND OWNERSHIP OF POLICY

5.1 The Board Risk Compliance Governance Committee (BRCGC) will provide the necessary oversight and oversee the implementation for this Policy. The Chief Integrity Officer (CIO) has the day-to-day responsibilities of administering, implementing and regularly monitoring and reviewing the Policy.

5.2 The owner of this Policy is the CIO who shall be responsible for incorporating any amendments and updates after BRCGC's deliberation and subsequently approval of the Board of Directors for all amendments and updates.

End of Section

FOR REFERENCE ONLY

DOC. TITLE	WHISTLEBLOWING POLICY			 Prasarana Malaysia Berhad
Doc. Ref. No.	PRA/POL/P&GCEO/INT-003			
Revision No.	1	Page No.	Page 13 of 13	

Appendix 1 – Governance Matrix

The Governance Matrix offers guidance for managing whistleblowing allegations from the receipt of the investigation report up to the Appeal Committee. This encompasses staff at all levels within the organization as well as board members. Matters involving board members will be managed in accordance with the Ministry of Finance (MOF) due process. In cases where BRCGC members are implicated, steps will be taken to exclude the implicated member.

If Subject is:	Party to inform Stakeholders	Stakeholders to be informed & recipients of investigation reports	DI Committee***	Disciplinary Committee (Stakeholders to deliberate type of misconduct and mete out consequence management)	Appeal Committee
Chairman	MOF nominee	MOF*	Not Applicable	Not Applicable	Not Applicable
Board Member	Chairman	Chairman and Board Members as selected by Chairman	Not Applicable	Not Applicable	Not Applicable
President/GCEO	BRCGC	Board	Board excluding the Board members for Disciplinary Committee and Appeal Committee	3 Board members	Chairman and 2 Board members (excluding those in DI and Disciplinary Committees)
C Suite incl Subsidiary CEO	CIO	PGCEO** and Board	PGCEO and 2 Board members excluding the BNRC	BNRC (with advisory from CHCO and Head of Legal and General Counsel)	Board excluding BNRC and DI Committee
Below C Suite (EVP and SVP)	CIO	PGCEO and relevant C Suite for the particular function	2 C Suites and Head of Legal and General Counsel	CHCO and 2 C Suites not in DI Committee and Appeal Committee	PGCEO and 2 C Suites not in DI and Disciplinary Committee
Below SVP level	CIO	Relevant C Suite for the particular function	3 members at higher rank than the accused	3 members at higher rank than the accused and not in DI Committee and Appeal Committee	CHCO and Head of Legal and General Counsel

*MOF officer to be informed will be the Secretary General of Treasury.

**For cases relating to C Suite and Subsidiary CEO, PGCEO to be informed first before the Board is informed. This also applies to the investigation report.

***DI Committee may include external party with certain subject matter expertise such as Industrial Relations.