



## Whistleblowing Policy & Guidelines

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**Abbreviations**

In this manual, the following abbreviations shall have the following meaning unless otherwise stated:

ARC	Audit and Risk Committee		CFO	Chief Financial Officer
BOD	Board of Directors		Cendana Capital	Cendana Impian Sdn Bhd or fund associated with the company

## 1.0 Whistleblowing Policy

In line with good corporate governance practices, the Board of Director (“BOD”) and Management of Cendana Impian Sdn Bhd (“the Company”) and its subsidiary companies (collectively known as the “Group” or “Cendana Capital”) encourage its employees, directors and associates to commit to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, the policy aims to support good management practices and sound corporate governance practices within the Group.

This policy aims to provide a structured mechanism for its employees, directors and associates (“reporting individual”) to rise or report suspected and/or known misconduct, wrongdoings, corruption and instances of fraud, waste, and/or abuse involving the resources of the Company to provide reassurance that they will be protected from reprisals or victimisation for whistleblowing in good faith.

For the purpose of this policy, the wrongful activities or wrongdoings refers to any potential violations or concerns relating to any laws, rules, regulations, acts, ethics, integrity and business conduct, including any violations or concerns relating to malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of the Group.

The BOD of Cendana Capital has a stewardship responsibility to communicate the requirements of this policy and to guide the organisation in dealing with concerns arising from wrongful activities or wrongdoings.

The Policy of the BOD is:

**1. To encourage active and moral obligation to report wrongdoings**

All employees and others are required to report any ongoing or suspected wrongful activities or wrongdoings at the earliest possible stage through the proper channel of reporting so that immediate action can be taken.

**2. To use internal disclosure to report wrongdoings**

As far as reasonable, internal disclosure is encouraged and used to avoid public crisis.

**3. To protect the whistleblower**

Where the disclosure is made in good faith, the whistleblower will be protected against victimisation or other adverse treatment.

**4. To ensure appropriate and fair disciplinary actions**

All actions taken against the alleged wrongdoers would be fair and without prejudice.

**5. To require that an effective whistleblowing guideline be established and maintained by Cendana Capital Group**

- Whistleblowing guidelines must be sufficient to:
- Establish formal and robust whistleblowing guidelines
- Prohibit legal sanctions for retaliatory action taken against the whistleblower;
- Establish timely, feedback, response and remedial and/or corrective action;
- Ensure that this policy is properly communicated to all employees;
- Establish procedures to maintain records confidentiality and retention; and
- Embed integrity, transparency and accountability within the business.

## **2.0 Whistleblowing Guidelines**

### **2.1 Definition**

The word whistleblowing in the context of this Whistleblowing Guidelines (“Guideline”) refers to a situation where a person (internal or external) raising or reporting concerns at an early stage about an ongoing or suspected wrongful activities or wrongdoing within Cendana Capital (“Cendana Capital” or “the Company”) and its subsidiary companies (collectively known as the “Cendana Capital Group”).

The person who raises or reports concern(s) of wrongful activities or wrongdoings within Cendana Capital Group is referred as “whistleblower”.

For the purpose of this Guideline, the wrongful activities or wrongdoings refers to any potential violations or concerns relating to any laws, rules, regulations, acts, ethics, integrity and business conduct, including any violations or concerns relating to malpractice, illegal, immoral, embezzlement and fraudulent activities which will affect the business and image of Cendana Capital Group.

### **2.2 Objective**

To provide an avenue and a structured mechanism for a person to raise or report concerns at an early stage about an ongoing or suspected wrongful activities or wrongdoing within Cendana Capital and, to protect the values of integrity, transparency and accountability in where Cendana Capital conducts its business and affairs.

### **2.3 Principles**

The Whistleblowing Policy is based on several key principles such as following:

- 2.3.1 To establish a formal and written Guidelines to provide a transparent method of addressing issues relating to whistleblower, such as answering standard questions, providing information and offering explanations.
- 2.3.2 To apply as a control measure to alert Cendana Capital’ Management to take the necessary remedial and/or corrective actions before a problem became a serious crisis.
- 2.3.3 To communicate to all employees and others on what the Whistleblowing Policy and Guidelines is and the key processes.
- 2.3.4 To encourage and enable employees and others to be able to report irregularities in good faith within Cendana Capital prior to seeking resolution outside Cendana Capital and without having to fear that their action may have adverse consequences.
- 2.3.5 To provide timely feedback and response.
- 2.3.6 To verify the report incidents in the appropriate manner and, if the reports are confirmed, all necessary steps to identify appropriate remedies will be taken promptly.
- 2.3.7 To ensure effective implementation of this Guideline. This will enhance Cendana Capital’ accountability in preserving its integrity and will be able to stand up to public scrutiny. This in turn enhances and builds credibility of our stakeholders.

## **2.4 Application**

- 2.4.1 This Guideline is intended to complement the existing internal controls system and, channels of communication and reporting lines within Cendana Capital.
- 2.4.2 The Whistleblowing Policy and Guidelines applies to all employees and others who want to report any wrongful activities or wrongdoings in good faith. The policy aims to provide an avenue to raise concerns and receive feedback on any action taken.
- 2.4.3 This policy is intended to cover concerns which fall outside the scope of other Cendana Capital' existing procedures which already are included in or covered by other Policies e.g. retaliation, discrimination and victimisation.
- 2.4.4 This Guideline will not apply to personal grievances. Such complaints will be dealt by Cendana Capital' designated personnel.

## **2.5 Administration**

- 2.5.1 The BOD, through the Audit and Risk Committee ("ARC"), shall exercise the oversight function over the administration of the policy and endorsed the policy.
- 2.5.2 The Management of Cendana Capital will adopt the Guidelines.
- 2.5.3 The administration of the policy and guidelines is to be carried out by the Managing Director of Cendana Capital.
- 2.5.4 The Managing Director shall propose to the Management any necessary amendments to the Guidelines for adoption before the presentation to the BOD for endorsement.

## **2.6 Circulation and Annual Review**

- 2.6.1 The Whistleblowing Policy is made available to public via the Cendana Capital' public website.
- 2.6.2 As for internal circulation within Cendana Capital, the Whistleblowing Policy and Guidelines is made available via circulation of memo/ email. It is deemed to be considered that all employees of Cendana Capital are aware, has read and understand the content of Whistleblowing Policy and Guidelines.
- 2.6.3 The Guideline will be reviewed on annual basis by the Manging Director and Management to ensure that the Guidelines is in accordance with Cendana Capital' business environment and the relevant standards, act and law.
- 2.6.4 The amendments will be updated in Cendana Capital' public website and circulation of memo / email accordingly.

## **2.7 Who can Whistleblow**

2.7.1 Once the Whistleblowing Policy and Guidelines are fully implemented, any of the following people can make a disclosure:

- a. Employees of Cendana Capital including, employees on contract terms, temporary or short-term employees and employees on secondment;
- b. Board members and Management;
- c. Ex-employees;
- d. Financiers;
- e. Customers;
- f. Shareholders; and
- g. Vendors for Cendana Capital which includes agents, contractors, suppliers, advisors, consultants, internal and external auditors.

2.7.2 No employees or Directors may use their position to prevent an individual to report any ongoing and suspected wrongful activities or wrongdoings.

## **2.8 What to Whistleblow**

2.8.1 A qualified disclosure may be made if it relates to one or more of the following wrongful activities or wrongdoings by any employees or service providers in the conduct of Cendana Capital' business or affairs that is being, has been, or is likely to be, committed:

- a. Failure to comply with legal obligations;
- b. Criminal offence;
- c. Criminal breach of trust;
- d. Bribery and corruption;
- e. Unofficial payoffs;
- f. Fraud;
- g. Collusion and money laundering;
- h. Improperly discriminatory;
- i. Misuse or abuse of Cendana Capital' funds or assets or assets misappropriation;
- j. Gross mismanagement within Cendana Capital;
- k. Gross negligent;
- l. Serious financial irregularity or financial fraudulent within Cendana Capital;
- m. Breach of Cendana Capital' Standard Operating Procedures;
- n. Breach of Cendana Capital' Delegation of Authority Matrix;
- o. Repeated ill treatment of a client/customer/supplier despite a complaint being made;
- p. Activities, which otherwise amount to serious improper conduct, including Cendana Capital' Code of Conduct and Ethics;
- q. Actions which endanger the health or safety of employees or the public and the environment;
- r. Actions which endanger National and public interest;
- s. Illegal or unlawful conduct or failure to comply with the provisions of the Government Laws and Regulations where the wrongdoer, knowingly, disregards or does not comply with such provisions;
- t. Sexual harassment;
- u. Knowingly directing or advising a person to commit any of the above wrongdoings; and
- v. Any action which is intended to conceal any of the above.

The above list is not exhaustive and there will be instances where whistleblower(s) would need to exercise judgement.

- 2.8.2 A whistleblower will not be expected to prove the truth of an allegation but he or she should be able to demonstrate that there are sufficient grounds to have a reasonable belief that something is wrong, and the report is not for personal gain. Malicious allegation will be treated as gross misconduct and if proven may lead to dismissal of employment.
- 2.8.3 If an individual is unsure whether a particular act or omission constitutes a wrongful activity or wrongdoing under Whistleblowing Policy and Guidelines, he or she is encouraged to seek advice or guidance from the Chairman of ARC for more clarification.

## **2.9 When to Whistleblow**

- 2.9.1 A whistleblower should immediately come forward with any information that he or she, in good faith, reasonably believes discloses a wrongful activity or wrongdoing is likely to happen, is being committed or has been committed.
- 2.9.2 However, he or she is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure. If he or she knows as a matter of fact that there are serious risks that a wrongful activity or wrongdoing is going to take place, such bona fide concerns should be raised immediately i.e. the whistleblower is able to show the reasons for concern.

## **2.10 Education Process**

- 2.10.1 Training and awareness on whistleblowing key processes and updates will be communicated via continuous training and awareness programmes and, via circulation of memo / email.

## **2.11 Confidentiality**

- 2.11.1 The Whistleblowing Policy and Guidelines is intended to safeguard the safety of the whistleblower's identity, and therefore undertakes to treat all whistleblowing reports as confidential.
- 2.11.2 All reports of violation or suspected violation will be kept as confidential to the extent possible, consistent with the need to conduct adequate investigation, unless otherwise required by law. Every effort will be made to protect the whistleblower's identity.
- 2.11.3 The Guideline provides assurances that the reporting mechanism for whistleblowing is set up in a structured and systematic manner to safeguard the information and the identity of the whistleblower. By setting up the necessary system to safeguard the confidentiality, the interests of the whistleblower are protected from possible harm through retribution by those who stand to benefit the reported misconduct.
- 2.11.4 The perception and the reality of safety of the information and the whistleblower identify are crucial to provide courage and confidence for individuals to speak up or report any sensitive issues that they believe in good faith that could have negative repercussion to Cendana Capital.



- 2.11.5 Approaches for confidential advice to outside parties, such as lawyers, unions, enforcement agencies or other external safe channels are acceptable, but that the Whistleblowing Policy and Guidelines Document is designed to prevent any unnecessary public disclosure of concerns.

## **2.12 Whistleblower Protection**

- 2.12.1 Upon making a disclosure in good faith, based on reasonable grounds and in accordance with the procedures pursuant to this Guideline, the whistleblower's identity will be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against Cendana Capital.

However, Cendana Capital will honour the request of the whistleblower if he or she request to maintain his or her identify confidential.

If situation arises where the report launched by the whistleblower cannot be preceded without revealing the identity of the whistleblower, the Chiarman of ARC will discuss with the whistleblower to determine the best available options taking into consideration the request of the whistleblower and to safeguard the interest of Cendana Capital.

- 2.12.2 Where a whistleblower makes a report under this policy in good faith, reasonably believed to be true; the whistleblower will be protected from harassment or victimisation within Cendana Capital, dismissal, disciplinary procedures or any other form of retaliatory action should the disclosure turn out to be inaccurate or false. Retaliation includes harassment and adverse employment consequence.
- 2.12.3 Cendana Capital will not tolerate punishment or unfair treatment when concerns are raised in good faith. A whistleblower who reports a contravention or a concern will be given protection and shall in no way be put at a disadvantage as a result of his or her report.
- 2.12.4 Any employee who shows the act of retaliation against the whistleblower who has reported a violation in good faith will be subjected to disciplinary action by Cendana Capital in accordance with the Code of Conduct and Ethics of Cendana Capital which includes termination of employment.

## **2.13 Safeguard against Abuse of Policy**

- 2.13.1 Reporting under this policy, however, would not immunise or shield a whistleblowing against action following from his or her intentional misconduct, which includes wilfully making allegations through the whistleblowing mechanism that the whistleblower knows to be false or makes with the intent to misinform or tarnish the reputation or others or due to personal gain.
- 2.13.2 Where a whistleblower makes a report not in good faith or reasonably believed not to be true, the whistleblower will not be protected and will be subjected to disciplinary action by Cendana Capital in accordance with the Code of Conduct and Ethics of Cendana Capital.

- 2.13.3 Malicious rising of unfounded allegations is a disciplinary offence and will be subjected to disciplinary action by Cendana Capital in accordance with the Code of Conduct and Ethics of Cendana Capital.

### **3.0 Reporting Process and Procedures**

#### **3.1 Procedures for Raising a Complaint**

- 3.1.1 When an individual is of the opinion that a specific concern falls within the scope of this Guideline and cannot be solved through Cendana Capital' existing internal written procedures / control systems, he or she can choose to make a report orally or in writing and submit it to Chiarman of ARC. If he or she decides to raise a matter orally, the respective employee will be requested to make a written statement subsequently.
- 3.1.2 In deciding whether or not an employee has acted reasonably, all circumstances will be taken into consideration but in particular:
- a. The identity of the person to whom the disclosure is made;
  - b. The seriousness of the relevant “wrongful activity” or “wrongdoing” and the impact to Cendana Capital, e.g. reputation and financial;
  - c. whether the “wrongful activity” or “wrongdoing” is continuing or is likely to occur in the future;
  - d. whether the disclosure is made in breach of a duty of confidentiality owed by the employer to any other person;
  - e. any action the employee or other person might be reasonably be expected due to previous unfavourable disclosure; and
  - f. whether the complaints rose has taken into consideration the existing internal controls.
- 3.1.3 When the whistleblower choose to put in writing in the event he or she feels the issues or concerns are sufficiently serious, the whistleblower can either email their complaint letter to ARC at [audit.committee@cendanacap.com](mailto:audit.committee@cendanacap.com) or mail the letter by marking “Private and Confidential” to the following address:
- To: Audit and Risk Committee  
c/o: Cendana Capital  
Pusat Dagangan Phileo Damansara 1, No. 9, Jalan 16/11,  
46350 Petaling Jaya, Selangor Malaysia.
- 3.1.4 The envelope and email will be opened by the Chairman of ARC. A respond letter will be sent to the address as specified by the whistleblower in the complaint letter or, his or her email.

- 3.1.5 The whistleblower is encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified.
- 3.1.6 The whistleblower is encouraged to disclose his or her particulars including, name, designation, current address and contact numbers to speed up the follow-up and investigation process.
- 3.1.7 The whistleblower should inform the Chairman of ARC of all details of his or her concerns as reasonably possible, including other details deemed to be useful to facilitate screening and action to be carried out under paragraph 3.2 and 3.3, if required.
- 3.1.8 The whistleblower may be asked to provide further clarifications and information from time to time, for example, if an investigation is conducted.
- 3.1.9 In respect of the whistleblower that reports a suspected violation in good faith and is not engaged in questionable conduct, Cendana Capital will attempt to keep its discussions and actions confidential to the greatest extent possible.
- 3.1.10 However, there may be circumstances where the whistleblower may be needed as a witness. Should this be the case, the Chairman of ARC will discuss the matter with the whistleblower at the earliest opportunity as specified in paragraph 2.12.1. In addition, in the course of investigation, Chairman of ARC may need to share information with others on a “need to know” basis subject to the approval from the Management/ BOD of Cendana Capital.

## **3.2 Screening**

- 3.2.1 The Chief Financial Officer (“CFO”) will screen and assess the whistleblower’s disclosure to determine whether it is related to a wrongful activities or wrongdoings specified in paragraph 2.8.1 or excluded from the scope of the Whistleblowing Policy and Guidelines.
- 3.2.2 Initial enquiries will be made via telephone communication or emails with the whistleblower to decide on how to deal with any concerns raised and determine whether further interview is required, and the form that it should take. Some concerns may be resolved without the need of an interview process.
- 3.2.3 If an interview is required, the CFO and/or Head of HR will meet with the whistleblower to obtain further information, clarification and documents which may be useful to support the alleged wrongdoings.

3.2.4 Upon completion of the initial enquiry and interview process, the complaints will be categorised into the following four (4) categories:

Category A	: Extreme rated cases
Category B	: High rated cases
Category C	: Medium rated cases
Category D	: Personal grievances cases

3.2.5 Upon completion of the screening process, the CFO will prepare a report for complaints under category A, B, C and D which will include general recommendations to the ARC.

3.2.6 Following table shows the frequency of whistleblowing reporting to the ARC:

Reporting	Contents
Communication within 7 days	Category A rated cases
Communication within one month	Category B & C rated cases

3.2.7 In the event there is an urgent attention required due to the seriousness of the allegation i.e. for Category A type of complaints, the ARC or Board members will be updated through verbal communication by the Chairman of ARC to determine the appropriate action. The screening process will be completed on an urgent basis if the complaint on the alleged wrongful activities or wrongdoings is capable of causing irreparable harm to Cendana Capital' reputation or its financial position.

3.2.8 For complaints which are specified under paragraph 2.4.3 and not specified under paragraph 2.8.1 i.e. Category D types of complaints, a separate report stating the nature of complaints, name, current address and contact numbers, the personnel alleged and additional information as required will be provided to the designated personnel for follow-up.

3.2.9 The individuals complaining under the Category D types of complaints will be directed by the designated personnel.

3.2.10 If the whistleblower's disclosure implicates the Managing Director, Management and/ or Board members, the Chairman of ARC will prepare a report which includes general recommendations for the Board Chairman's consideration.

### 3.3 Preliminary action

3.3.1 The ARC will make decisions including but not limited to any of the following:

- a. Rejection of the whistleblower's disclosure; or
- b. Directing investigation by the internal expertise, Chairman of ARC or any subject matter experts;
- c. Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the Code of Conduct and Ethics of Cendana Capital to facilitate any fact-finding or to avoid any whistleblower's exposure to a threat or harm;
- d. Referral to the police or any other appropriate enforcement authority;

e. Referral to BOD for decision.

3.3.2 All decisions made by the ARC and reasons of action thereof shall be properly documented.

3.3.3 If the case is referred to the BOD for decision, the BOD, together with the general recommendations made by the ARC, will make decisions including but not limited to any of the following:

a. Directing investigation by the internal expertise, Chairman of ARC or any subject matter experts; or

b. Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the Code of Conduct and Ethics of Cendana Capital to facilitate any fact-finding or to avoid any whistleblower's exposure to a threat or harm, or

c. Referral to the police or any other appropriate enforcement authority.

All decisions made by the ARC / BOD and reasons of action thereof shall be minuted in the minutes of meetings of the ARC / BOD.

3.3.4 Subject to legal constraints, the whistleblower will be notified of the status of his or her whistleblower's disclosure based on the preliminary action taken by the ARC / BOD as far as reasonably practicable, in good time.

The status will be updated by CFO upon approval from the ARC / BOD.

3.3.5 The alleged wrongdoer will also be informed of the allegations and given an opportunity to answer the allegations at the upcoming investigation or appeal his or her case. The rights of person are specified under ***Paragraph 4.0 – Rights of Person Implicated***.

### **3.4 Investigation**

3.4.1 The investigation would be carried out under the terms of strict confidentiality, by not informing the subject of the whistleblower's disclosure complaint until (or if) it becomes necessary to do so.

3.4.2 The whistleblower and the alleged wrongdoer are expected to give his or her full cooperation in any investigation or any other process carried out pursuant to this Guideline and/ or the disciplinary action in accordance with the Code of Conduct and Ethics of Cendana Capital. The amount of contact between the whistleblower, the alleged wrongdoer and the investigating party will depend on the nature of the issue and the clarity of the information provided. Further information may be sought from or provided to whistleblower and the alleged wrongdoer.

3.4.3 The investigation will be carried out internally and/ or by outside party and the directive of the investigation could be from the BOD.

3.4.4 As far as possible, all investigations will be completed within 30 working days. However, complex investigation that requires longer period will be notified to the BOD.

3.4.5 In the event the whistleblower is implicated or discovered to be or have been involved in any wrongful activities or wrongdoing, he or she may also be investigated so as to complete the fact-finding process in accordance with this Guideline and/or the disciplinary action of Code of Conduct and Ethics of Cendana Capital.

3.4.6 If the alleged wrongdoer or any other implicated persons has/have, or is/are found to have:

- committed a wrongdoing; or
- taken serious risks which would likely cause a wrongdoing to be committed

based on the investigation directed by the BOD, the action to be taken against that alleged wrongdoer or any other implicated persons will be subjected to Disciplinary Action in accordance with the Code of Conduct and Ethics of Cendana Capital, which may include formal warning or reprimand, demotion, suspension or termination of employment or services with Cendana Capital.

3.4.7 The BOD, with the recommendation from the ARC, will have the final decision on the appropriate measures to be taken including, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons. The ARC of Cendana Capital will seek guidance from legal expert or Chairman of ARC when considered necessary.

3.4.8 In circumstances where immediate decision is required, any Board members, with the recommendation of the Chairman of ARC, will make the decision on the appropriate measures to be taken, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons. The report will be presented subsequently to the BOD for approval and final decision.

3.4.9 In the event the implicated personnel is the Managing Director or the Board members, the BOD, based on the investigation report, will have the final decision on the appropriate measures to be taken including, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons.

3.4.10 All decisions made by the BOD and reasons of action thereof shall be minuted in the minutes of meetings of the BOD.

### **3.5 Reporting of Outcome**

3.5.1 Subject to any legal constraint, the whistleblower and, if applicable, the alleged wrongdoer will be notified in writing of the decision of the BOD, on whether any wrongful activities or wrongdoings specified under paragraph 2.8.1 have occurred or not and the alleged wrongdoer is guilty or not, in good time, and the basis thereof.

3.5.2 The notification letter would be signed by the Chairman of ARC or one of the Board members of Cendana Capital.

3.5.3 If the whistleblower is unhappy / dissatisfied with the outcome of the investigation, the whistleblower may submit another detailed report explaining why this is the case and the whistleblower's concern will be investigated again if there is good reason to do so to the Chairman of ARC and/or to the Board Chairman.

- 3.5.4 A summary of case reported by Whistleblower will be prepared by CFO / Company Secretary upon receiving of necessary documents or evidences, stating the nature of complaints received the results thereof, action taken and recommendation for reporting to the BOD. The follow-up action on opened cases and the unresolved complaints will be updated to the BOD on a monthly basis.
- 3.5.5 Board Executive Summary Report will be provided to the BOD on a quarterly reporting basis, if any.

#### **4.0 Rights of Person Implicated**

- 4.1 Cendana Capital' employees or other persons who are implicated of wrong doings/ alleged wrongdoers will be notified in good time of the allegation made against them provided that this notification does not impede the progress of the procedures for establishing the circumstances of the case.
- 4.2 All alleged wrongdoers will be given the opportunity to put forward their comments during the investigation in keeping with the principle respect for the "right to have a fair hearing", as interpreted by the law.
- 4.3 All alleged wrongdoers have the duty to attend and assist the investigation process.

#### **5.0 External Disclosure**

- 5.1 If the procedures under the Whistleblowing Policy and Guidelines have been exhausted, or the whistleblower is still not satisfied with the Cendana Capital' response and reasonably believes that the information disclosed, and any allegation contained in it, are substantially true, he or she is at liberty to take the matter further by raising it with the relevant governmental, regulatory authorities and enforcement agencies in Malaysia or in the country concerned. External disclosure may further be made in case of an important and urgent public interest or required by the law.
- 5.2 Whilst the whistleblower(s) is able to report issues externally, the whistleblower must be aware that there is a difference between reporting internally through the letter or email, and externally. To report internally, the whistleblower must be suspicious that there is malpractice whereas to report externally, the whistleblower must have reasonable belief that malpractice has or is taking place and some evidence to support the report and, he or she believes that the framework will not adequately dealt with the matter. External disclosures must be made in good faith, in the belief that allegations are substantially true and there should be no motive for personal gain.
- 5.3 The instrument of external reporting should in reasonable opinion of the whistleblower is in balance with the relevant matter and there should not be a less potentially damaging option available.
- 5.4 The whistleblower should minimise the possible impact of his or her actions to Cendana Capital and to the people involved. The external party one considers disclosing information to, should be a party which will be able to effectively organise action against the alleged contravention.

- 5.5 An employee who makes an external complaint in good faith to any the relevant governmental, regulatory authorities and enforcement agencies in Malaysia or in the country concerned after exhausting Cendana Capital' existing internal procedure will be protected against victimisation or other adverse treatment.

## **6.0 Time Limits and Retention of Records**

- 6.1 Time limits should be allocated for each stage of the procedure. If the time limits pass without any satisfactory action being taken, the concerns should be raised at the next level.
- 6.2 The CFO will retain for a minimum period of seven (7) years all records relating to any whistleblower case(s) and its related investigation report, if any.
- 6.3 All records will be maintained in good condition to protect evidence and avoid legal repercussions at dedicated place as allocated by the Chairman of ARC.
- 6.4 All records will be treated as confidential and only designated personnel as assigned by the Chairman of ARC will have the accessibility of the records.

## **7.0 Privacy**

- 7.1 Cendana Capital is committed to protect the privacy of the persons involved to the fullest extent possible and in accordance with applicable laws. Any personal data obtained through or as part of this Guideline, will only be used for the purposes explained in this Guideline and will only be provided to those who have a need to know these data for these purposes or to comply with the law or an important public interest.

Dated: 01 January 2025