

WHISTLEBLOWING POLICY

1 Definitions

- 1.1 All words and expressions used in this policy shall have the same meanings as those assigned to them in the Code of Conduct for Business Partners.

2 Purpose and Scope

- 2.1 All organisations face the risk of things going wrong or of unknowingly harbouring malpractice and/or improper conduct. The Company takes this very seriously and are committed to conducting our business with honesty and integrity and we expect all our Business Partners to maintain high standards too. We encourage open communication from all those who work with us and we want everyone to feel secure about raising concerns.
- 2.2 The Company is committed to protecting the whistleblower if they raise concerns in the correct way by way of this whistleblowing policy (the “Policy”). It does not matter if an individual who raises a concern is mistaken about it—he or she does not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice and/or improper conduct.
- 2.3 This Policy applies to all our Business Partners as defined in the Code of Conduct for Business Partners.

3 Improper conduct covered by this Policy

- 3.1 Whistleblowing is the reporting of suspected improper conduct, wrongdoing or dangers in relation to the activities the Company undertakes. Although not exhaustive, malpractice and/or improper conduct can include the following:
- 3.1.1 fraud, theft or embezzlement;
 - 3.1.2 other criminal offences, including those in relation to bribery and corruption and tax evasion facilitation;
 - 3.1.3 miscarriages of justice;
 - 3.1.4 danger to the health and safety of any individual;
 - 3.1.5 damage to the environment;
 - 3.1.6 breach of any legal or professional obligation, including those in relation to bribery and corruption and tax evasion facilitation;
 - 3.1.7 misuse of Company’s property; and
 - 3.1.8 deliberately concealing any of the above.

4 The Company's Guarantee and Protection Offered

- 4.1 If you use this Policy to raise a concern, we give you our assurance that, to our best endeavours; that you will not suffer any form of retribution or detrimental treatment. We will treat your concern seriously and act according to this Policy.
- 4.2 If you ask for a matter to be treated in confidence, we will respect this request and, unless the law requires otherwise, will only make disclosures to third parties or other staff with your consent.
- 4.3 No member of staff must threaten or retaliate against an individual who has raised a concern and we will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action and in some cases will be liable to a claim for compensation brought against them personally.
- 4.4 However, to ensure the protection of all our staff, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest may also be liable to disciplinary action.

5 Procedure for raising a concern

- 5.1 If you are concerned about any form of malpractice and/or improper conduct covered by this policy, you should raise the issue in writing (via email is acceptable) by completing and submitting the form set out in Schedule 1 of this Policy to the Legal Counsel, CSF TelcoHub 1, 3552, Jalan Teknokrat 6, Cyberjaya 63000 Selangor Darul Ehsan, Malaysia or legal@csf-group.com.
- 5.2 Although you are not expected to prove the truth of your concern beyond doubt or provide evidence, you will generally need to provide, as a minimum, details of the nature of the concern and why you believe it to be true, and the background and history of the concern (giving relevant dates where possible).

6 Responding to concerns raised

- 6.1 The Company is committed to ensuring that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. We will arrange a meeting as soon possible to discuss the concern raised. We may ask you for further information about the concern raised, either at this meeting or at a later stage.
- 6.2 After the meeting, we will decide how to respond. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised.
- 6.3 To the extent which is reasonably practicable, we will keep you informed of the progress of the investigation carried out and when it is completed, and give you an indication of timings for any actions or next steps that we will take, but we cannot inform you of any matters which would infringe any duty of confidentiality owed to others.

7 Confidentiality

- 7.1 All concerns raised will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. However, if disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of a disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

8 Raising your concern externally (exceptional cases)

- 8.1 The main purpose of this policy is to give all our Business Partners the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action.
- 8.2 However, if for whatever reason, you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, the law recognises that it may be appropriate for you to raise the matter with another prescribed person, such as a regulator or professional body or a government authority.
- 8.3 We strongly encourage any individual to seek appropriate advice before reporting a concern to anyone external.

9 Further information and contacts

- 9.1 If you have any queries about the application of this policy, please contact the Designated Contact according to the method set out in Schedule 2 of this Policy.



**WHISTLEBLOWING POLICY
FOR BUSINESS PARTNERS**

**SCHEDULE 1
WHISTLEBLOWING REPORT FORM**

Reports under the Whistleblowing policy can be in writing. To make a report in writing (either anonymously or including your identity) please complete this form, in as much detail as possible, and send to the Designated Contact as stated in Schedule 2 below.

Type of conduct (i.e. what was said or done?)	
Company/Organisation Involved	
Individual(s)/department(s)/team(s) involved	
Frequency of occurrence	
Date(s) of occurrence	
Place(s) of occurrence	
Do you have direct knowledge of the matter being reported? Yes/No If no, how did you become aware of it?	Yes/No [If 'Yes', insert details]
Do you know if anyone else is aware of the matter being reported? Yes/No If yes, please identify them and detail how they became aware	Yes/No [If 'Yes', insert details]
Does the matter being reported affect you or your work? Yes/No If yes, please describe how	Yes/No [If 'Yes', insert details]
Additional information/further comments	
Your signature, name and contact details Optional	



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SCHEDULE 2

DESIGNATED CONTACT AND REPORTING FLOWCHART

Guidance Note:

The Designated Contact is the key contact within the Company for whistleblowers. The table below sets out the Designated Contact(s) in the event that the relevant sections and/or clauses are triggered.

Only in the event that you are unable to contact the First Designated Contact (or if the First Designated Contact is the subject of your complaint, report or query), you may contact the Second Contact. If any or all the Designated Contacts are unavailable or are the subject(s) of your complaint, report or query, please raise your complaint according to the Reporting Flowchart in Fig 1.1 below.

First Designated Contact and Details

Legal Counsel

Email Address: legal@csf-group.com

Telephone Number: +603 8311 9563

Second Designated Contact and Details

Chief Operating Officer

Telephone Number: +603 8311 9563

Fig 1.1

REPORTING FLOWCHART

