

# Whistle-Blowing Policy

## 1. Introduction

- 1.1 SEG International Bhd and its subsidiaries (“SEGi”) commits to conduct business with utmost fairness, integrity and respect for the laws, rules and regulations, Code of Conduct and SEGi’s policies and procedures. However, there may still be instances of misconduct or non-compliances that seem to violate the laws, rules and regulations, Code of Conduct and SEGi’s policies and procedures.
- 1.2 As such, directors, employees and representatives (i.e. any person who performs services for or on behalf of SEGi such as, but not limited to, contractors, suppliers, vendors, agents, consultants, advisors, joint-venturers, partners, organisations controlled by SEGi or other intermediaries) are encouraged to raise genuine concerns at the earliest opportunity via the whistle-blowing channels.

## 2. Objective of the Policy

- 2.1 The whistle-blowing channels have been established to provide our directors, employees and representatives a transparent and confidential channel to voice their concerns without fear of reprimand or reprisal, on any misconduct or non-compliances that they may have observed in SEGi.
- 2.2 This will help to promote transparency and accountability throughout SEGi.

## 3. Scope of the Policy

- 3.1 This policy covers the following possible violations of laws, rules and regulations, Code of Conduct and SEGi’s policies and procedures, such as:
  - Fraud;
  - Bribery or corruption;
  - Conflict of interest;
  - Misuse of confidential information;
  - Improper use of company assets;
  - Discrimination or harassment; and
  - Environmental, health and safety issues.

*Please note that the above list is not exhaustive.*

- 3.2 This policy is **not** to be used for:
  - Personal grievances;
  - Settling personal disputes; and
  - Making false accusations.

## 4. Principles

4.1 The principles underpinning the policy are as follows:

- all concerns should be made in good faith;
- all concerns raised will be treated fairly with confidentiality and care;
- only genuine concerns will be acted upon; and
- SEGi will assure that no one will be at risk of suffering any form of reprisal from SEGi as a result of raising a genuine concern even if the individual is mistaken. SEGi, however, does not extend this assurance to someone who maliciously raises a matter he/she knows is untrue.

## 5. Procedures

5.1 Any director, employee or representative who believes reasonably and in good faith that misconduct or non-compliances exists, they may report the concerns to either the:

- Director of Internal Audit; or
- Audit Committee Chairman.

5.2 The party concerned could either email or submit their complaints via letter.


5.3 Any party who raises their concerns or submits the complaints via email or letters, should disclose their name, contact number, details of person(s) involved, nature of allegation, when and where the incident took place and provide evidence, if possible.

5.4 All reports will be treated as confidential and will be investigated promptly.

5.5 Once the investigation is completed, SEGi's representative will inform the whistleblower (where possible) of the results of the investigation as well as any corrective actions that may be taken.

## 6. Whistle-Blowing Channels

6.1 The whistle-blowing channels are as follows:

Channels	Details
Whistle-Blowing Channel 	If you would like to pen down your concerns, you can write in via e-mail or letter to the Whistle-Blowing channel. The details are as follows:-  i) <b>E-mail:</b> <a href="mailto:whistleblowing@segi.edu.my">whistleblowing@segi.edu.my</a>  ii) <b>Letter:</b> SEG International Bhd 6th Floor, SEGi University, No. 9, Jalan Teknologi Taman Sains Selangor, Kota Damansara, PJU 5, 47810 Petaling Jaya, Selangor Darul Ehsan  Attention: Director of Internal Audit; or Audit Committee Chairman  “Strictly Confidential”

## **7. Confidentiality**

- 7.1 The identity of the whistleblower will be kept anonymous. However, their consent will be sought should there be a need to disclose their identity for investigation purposes.
- 7.2 Any party who has participated or assisted in an investigation will also be offered similar protection as offered to whistleblowers.

## **8. Disciplinary Action**

- 8.1 If the claim of misconduct or non-compliance is sufficiently substantiated, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of employment. Additionally, legal action may also be taken against the responsible individual(s).
- 8.2 Any act of retaliation or victimisation against the whistleblower or any party who has participated or assisted in an investigation will also result in disciplinary action, up to and including termination of employment.

Malicious and false allegations will be viewed as a serious misconduct, and may be subject to appropriate disciplinary action, up to and including dismissal. Additionally, legal action may also be taken.