



**FREIGHT MANAGEMENT HOLDINGS BHD  
(Company No. 380410-P)**

**Whistleblowing Policy**

**1. Objective**

- 1.1** Freight Management Holdings Bhd (FMHB) is committed to achieving and maintaining a high standard of integrity, openness and accountability in the conduct of its business and operations. (FMHB shall include Freight Management Holdings Bhd and its group of companies).
- 1.2** In line with the abovementioned values, FMHB provides an avenue for all its employees and members of the public to disclose any improper conduct within FMHB. The policy is designed to ensure that employees or members of public can raise concerns of improper conduct without fear of reprisals and unfair treatment or practices.

**2. Scope of Policy**

- 2.1** The Whistleblowing Policy shall be implemented in line with the applicable laws such as: Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009, and Personal Data Protection Act 2010.
- 2.2** “Whistleblower”: Any person making a complaint or report under this Whistleblowing Policy.
- 2.3** A disclosure of an improper conduct includes, but is not limited to the following:
- Bribery, Corruption and blackmail
  - Fraud, cheating, falsification, or misuse of FMHB property and information
  - Harassment
  - Embezzlement, theft, pilferage, or participation in unauthorized financial transaction.
  - Money Laundering
  - Conflict of interest
  - Criminal offences
  - Endangerment of an individual’s health and safety
  - Concealment or cover-up of any of the above improper conduct
- 2.4** The Whistleblowing Policy is not set up to deal with staff grievances, for which separate procedure exists.

### **3. Confidentiality and Protection to Whistleblower**

- 3.1** Any anonymous disclosure will not be entertained. Any person (including employee or member of the public) who wishes to report improper conduct is required to disclose his/her identity to **FMHB** in order for **FMHB** to accord the necessary protection to him/her. However, **FMHB** reserves its right to investigate into any anonymous disclosure.
- 3.2** Any person having knowledge of a report of improper conduct or is assigned to perform an investigation, shall make all reasonable efforts to maintain the confidentiality of the Confidential Information or any part thereof, in particular the identity of the whistleblower. Such confidentiality and protection will continue notwithstanding that the investigation later reveals that the whistleblower is mistaken as to the facts, rules and procedures of improper conduct.
- 3.3** However, there may be circumstances, during the course of the investigation where it will be necessary to disclose the identity of the whistleblower. If such circumstances exist, the independent party conducting the investigations shall endeavour to inform the whistleblower that his/her identity is likely to be disclosed and to obtain his/her consent for the said disclosure.
- 3.4** In order not to jeopardise any investigation, the whistleblower shall make all reasonable efforts to maintain the confidentiality of the Confidential Information, in particular, the fact that a report has been filed, and the nature of the improper conduct and the identity of the person(s) who have allegedly committed the improper conduct.
- 3.5** All reports or disclosures or such other details shall be kept confidential for a minimum period of 7 years. Disclosure of any of the investigation documents/information to individuals who are not involved in the investigation will be viewed as gross misconduct.
- 3.6** This Whistleblowing policy provides assurances that the whistleblower, will be protected against any reprisal, intimidation, adverse or detrimental actions for disclosing any improper conduct committed or about to be committed within **FMHB** to the extent reasonably practicable, except;
- The whistleblower himself/herself has participated in the improper conduct disclosed
  - The whistleblower willfully made in the disclosure of improper conduct a material statement which he/she knew or believed to be false or did not believe to be true
  - The disclosure of improper conduct is frivolous or vexatious
  - The disclosure of improper conduct principally involves questioning the merits of government policy, including policy of a public body
  - The disclosure if improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action
  - The whistleblower, in the course of making the disclosure or providing further information, commits an offence under this Act

#### **4. Actions & Notification**

- 4.1** **FMHB** shall verify the authenticity of the disclosures made by the whistleblower. **FMHB** will decide on a case by case basis on the investigation and follow-up actions required.
- 4.2** **FMHB** shall communicate to the whistleblower within seven working (7) days of the decision for resolution of the disclosed improper conduct. Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

#### **5. Investigation**

- 5.1** Upon the receipt of a disclosure of improper conduct, the Chairman of the Audit and Risk Management Committee (**ARMC**) shall in his/her discretion decide whether the case shall be closed or to proceed to a full investigation of the allegations or to refer the matter to the relevant authorities or determine any other course of action that he/she deems fit having regard to the circumstances of the matter reported and the fairness of the conduct of any investigation. (Refer section 7).
- 5.2** In the event a full investigation is to be carried out, the independent party appointed to carry out investigations will inform the whistleblower and the whistleblower shall give his/her full cooperation during the conduct of the investigation.
- 5.3** The procedures of the investigation shall adopt the due processes to avoid any conflicts of interest and to ensure procedural fairness to the particular person(s) involved.
- 5.4** Employees who are interviewed or are asked to provide information, have a duty to fully cooperate with the investigators and shall refrain from discussing or disclosing matters or information concerning to the investigations to the suspect(s), other employees or person (s) not involved in the matter.
- 5.5** All information, documents, records and reports relating to the investigation of a person(s) improper conduct shall be kept securely to ensure its confidentiality.
- 5.6** If the report of investigation makes a finding that:
- The disclosure of improper conduct is not substantiated; the **ARMC** shall inform the whistleblower.
  - The complaint constitutes an improper conduct, the **ARMC** shall initiate disciplinary proceedings and/or take such steps as it deems appropriate (including but not limited to making a police report) against the person (s) who had committed the improper conduct.

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**6. Reporting Channels**

**6.1** The Whistleblower can lodge a suspected, potential and/or actual improper conduct by submitting the following information to the prescribed channels:

- Name of the whistleblower
- Contact number of the whistleblower
- Details of person involved
- Nature of concerns
- When and where the incident took place and provide evidence, if possible

**6.2** The prescribed reporting channels are as follows:

- a) Report in person to the respective Head of Department,
- b) Or email attention to either:

<b>Position</b>	<b>Email address</b>
1. Head, Compliance	<a href="mailto:compliance@fmgloballogistics.com">compliance@fmgloballogistics.com</a>
2. The Chairman, Audit And Risk Management Committee	<a href="mailto:armc@fmgloballogistics.com">armc@fmgloballogistics.com</a>

- c) Or write in, attention to the above position, using sealed envelope.

Address:

**Wisma Freight Management  
Lot 37, Lebuh Sultan Mohamad 1, Kawasan Perindustrian Bandar Sultan  
Suleiman 42000 Port Klang, Selangor Darul Ehsan**

**7. Oversight of Audit And Risk Management Committee (ARMC) in relation to Whistleblowing**

- 7.1** The **ARMC** Chairman shall provide oversight function over the administration of this policy.
- 7.2** The Compliance Department shall assist the **ARMC** Chairman to compile and upkeep records on information of the whistleblower disclosure.
- 7.3** The **ARMC** Chairman may seek independent legal advice or any other professional advice regarding the report made.
- 7.4** The selected Investigation Team shall be approved by the **ARMC** Chairman.
- 7.5** The Investigation Team shall be selected among others on the basis of independence, fair, knowledgeable of subject matter, knowledge of investigation techniques, etc.
- 7.6** The Investigation Team shall report the progress and present the final report to the **ARMC** for review. The final report shall include **ARMC** recommendation for discipline actions and/or relevant improvement actions.
- 7.7** The Board Of Directors shall review the final report and implement the appropriate control measures to correct and prevent any future improper conduct and damaged to **FMHB**.

This Whistleblowing Policy is reviewed, approved and adopted by the Board of Directors on 8<sup>th</sup> April 2020.