

DIALOG

DIALOG GROUP BERHAD

WHISTLE-BLOWING POLICY

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WHISTLE-BLOWING POLICY

1. POLICY STATEMENT

- 1.1 DIALOG Group Berhad and its subsidiaries – hereinafter referred to collectively as “DIALOG”, are committed to the highest standards of integrity, openness and accountability in the conduct of its businesses and operations. We strive to conduct our affairs in an ethical, responsible and transparent manner at all times.
- 1.2 In this regard, we expect the highest standards of integrity from all our directors, management, employees (collectively “Employees”), contractors and suppliers of DIALOG.
- 1.3 We take a serious view of any wrongdoing by any of our Employees, business partners, contractors and suppliers, in particular with respect to their obligations to DIALOG’s interests.
- 1.4 An accountable and transparent workplace also provides a mechanism for Employees and members of the public to voice genuine concerns in a responsible and appropriate manner.
- 1.5 In line with the above, DIALOG provides avenues for all Employees and members of the public to disclose any improper conduct within DIALOG.
- 1.6 We also view any harassment or retaliation in any form or manner against a genuine whistleblower seriously, and will treat such action as gross misconduct, which if proven, may lead to disciplinary action, including, without limitation, termination of the relevant employment, or contract/agreement, as the case may be.

2. OBJECTIVE

- 2.1 The objective of this Whistle-blowing Policy (“the Policy”) is to provide an avenue for all Employees of DIALOG and members of the public who have become aware of or genuinely suspects that an Employee, business partner, contractor or supplier has engaged, is engaged or is preparing to engage in any Improper Conduct or Detrimental Action (as defined in 3.2 and 3.3 below), to report possible improprieties at the earliest opportunity without fear of reprisal or Detrimental Action.

3. SCOPE

- 3.1 **The Policy** is designed to facilitate Employees and members of the public to report any alleged / suspected **Improper Conduct and/or Detrimental Action**, through the channels which have been established for this purpose.
- 3.2 **Improper Conduct** is any conduct which, if proved, results in a disciplinary action or constitutes a criminal offence. These include, but is not limited to, the following:
 - Criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
 - Failure to comply with legal or regulatory obligations;
 - Misuse or misappropriation of company’s funds or assets;
 - An act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
 - Unsafe work practices or substantial wasting of company resources;

- Conflicts of interest or abuse of power;
- Misuse of confidential information;
- Sexual harassment;
- Acts or omissions which are deemed to be against the interest of DIALOG, laws, regulations, or public policies;
- Giving false or misleading information (including suppression of any material facts or information);
- Non-compliance or breaches of DIALOG's policies or Code Of Business Ethics ("COBE"); or
- Concealment of any of the above.

3.3 **Detrimental Action** is any reprisal action against a whistle-blower, including but not limited to:

3.3.1 Action causing injury, loss or damage;

3.3.2 Intimidation or harassment;

3.3.3 Interference with the lawful employment or livelihood or any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person's employment, career, profession, trade or business or the taking of disciplinary action; or

3.3.4 A threat to take any of the actions referred to above.

3.4 The Policy is not intended for petty, trivial or frivolous complaints or reports. Only genuine concerns of a serious or sensitive nature should be reported under this Policy. This Policy does not invalidate the existing grievance procedures that are in place, but aims to provide more avenues for Employees and members of the public to disclose Improper Conduct committed or about to be committed in DIALOG.

3.5 The Policy is part and parcel of DIALOG's COBE.

4. DEDICATED REPORTING CHANNEL

4.1 Any Improper Conduct that is discovered or genuinely suspected by the Whistle-blower shall be reported immediately.

4.2 A report of Improper Conduct and/or Detrimental Action may be made by:

4.2.1 Completing the **Whistle-blower Form** which can be submitted online via www.dialogasia.com/whistleblowing-eform; or

4.2.2 Downloading the **Whistle-blower Form** from our website at www.dialogasia.com/whistleblowing-policy, and:

4.2.2.1 Emailing the completed form to whistle@dialogasia.com; or

4.2.2.2 Submitting the completed form in a SEALED envelope marked PRIVATE & CONFIDENTIAL addressed to:

Mail Box Unit No. 216, MBE One Utama,
Lot LG109B, One Utama Shopping Centre,
No. 1, Lebuhr Bandar Utama,
47800 Petaling Jaya, Selangor Darul Ehsan.

5. ACTING IN GOOD FAITH

- 5.1 We expect all parties to act in good faith and have reasonable grounds when making a report in line with this Policy.
- 5.2 If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including immediate dismissal and/or legal action, where applicable.

6. ANONYMOUS REPORTS

- 6.1 Anonymous reports are allowed under this policy. However, please note that this may hinder investigations as follow-up questions may be necessary.

7. WHISTLE-BLOWER PROTECTION

- 7.1 A whistle-blower will be accorded with protection of confidentiality of identity, except if necessary for investigation purposes.
- 7.2 Nonetheless, the whistle-blower's consent is still required for disclosure of his/her identity and other personal confidential information, except as required by law.
- 7.3 Where a whistle-blower has acted in good faith, on honest and reasonable grounds at the material time, DIALOG is committed not to take any action(s) against such persons, including but not limited to:
 - 7.3.1 Dismissing or threatening to dismiss the whistle-blower;
 - 7.3.2 Taking disciplinary action or threatening to discipline against the whistle-blower, or suspending or threatening to suspend the whistle-blower;
 - 7.3.3 Subjecting the whistle-blower to any form of harassment or abuse;
 - 7.3.4 Imposing any penalty, directly or indirectly, on the whistle-blower;
 - 7.3.5 Discharging, demoting or discriminating against the whistle-blower.
- 7.4 Such protection is accorded to the whistle-blower, even if the investigation later does not lead to any corrective action being taken against the person(s) against whom the report was made.

8. NOTIFICATION

- 8.1 The whistle-blower will be accorded the privilege to be notified on the outcome of the disclosure, upon the completion of the whistle-blowing process and procedures.

[Whistle-blower Form \(PDF, 210Kb\)](#)

[Whistle-blower E-form](#)

WHISTLE-BLOWING PROCEDURES

1. MAKING A REPORT

- 1.1 Whistle-blowing reports can be made via the dedicated reporting channels as set out in the Whistle-blowing Policy;

2. RECEIPT, EVALUATION AND INVESTIGATION OF WHISTLE-BLOWING REPORT(S)

- 2.1 All whistle-blowing reports will be channelled to the Whistle-blowing Secretariat, which comprises of the following members:
 - 2.1.1 Director of Operations Excellence
 - 2.1.2 Head of Group Legal
 - 2.1.3 Head of Internal Audit
 - 2.1.4 Any other designated member that may be appointed by the Board of Directors from time to time.
- 2.2 The Whistle-blowing Secretariat will be responsible for:
 - 2.2.1 The receipt of the whistle-blowing reports;
 - 2.2.2 The escalation of the whistle-blowing reports received to the appropriate party for further investigation;
 - 2.2.3 The preparation and presentation of periodic reports to the Board of Directors;
 - 2.2.4 Notifying the whistle-blower (where the whistle-blower has identified him/herself) on the outcome of the whistle-blowing report received, upon the completion of the whistle-blowing process and procedures.
- 2.3 The respective Heads and/or Investigation Team(s) shall provide the Whistle-blowing Secretariat with updates on the status and outcomes of the investigations on a timely basis.

3. TRACKING & MONITORING

- 3.1 The Whistle-blowing Secretariat shall keep a log of all Whistle-blower Forms received and maintain proper records in relation to those whistle-blowing reports accordingly.
- 3.2 The Whistle-blowing Secretariat shall provide the Board of Directors with a quarterly update on the number, nature and status of whistle-blowing reports received, and any other relevant information in relation to the implementation of this Policy.