

Document Title: U Whistleblower Policy		
Document ID: -		Info Classification: Public
Doc Reference: CEO-POL-004-Whistleblower Policy	Version: 3.0	Effective Date: 22/01/2021
Policy Owner: Audit Committee (AC)		



U Whistleblower Policy

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Revision History

Revision	Author	Designation	Effective Date	Description of Changes
1.0	Internal Audit (IA)	-	-	Initial version
2.0	Internal Audit (IA)	Head of IA	16 Oct 2020	Updated in terms of format and content in line with the requirements of Section 17A of the MACC Act
3.0	Internal Audit (IA)	Head of IA	22 Jan 2021	Enhancement of the WB sections

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Document Authorization

The document has been reviewed by the following persons:

Reviewer


Name	Designation	Division	Signature	Date
<i>Gabriel Chang</i>	<i>Head/ AGM of IA</i>	CEO's Office		22 Jan 2021

Quality Review by PPM:

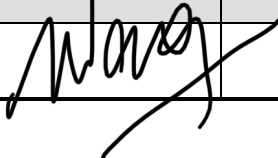
Name	Designation	Division	Signature	Date
<i>Serlene Koay</i>	<i>Senior Manager, Process Improvement & Excellence</i>	Corp. Services		29 Jan 2021

The document has been endorsed by:

Endorsed by Policy Administrator & Implementor:

Name	Designation	Division	Signature	Date
<i>Gabriel Chang</i>	<i>Head/ AGM of IA</i>	CEO's Office		22 Jan 2021

Endorsed by Key Stakeholders:

Name	Designation	Division	Signature	Date
<i>Wong Heang Tuck</i>	<i>Chief Executive Officer</i>	U Mobile		

Approval:

Approved by Audit Committee (AC) on the 30th Audit Committee Meeting held on 22 January 2021 (Minuted)

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Document Reference & Distribution

Document Reference:

The enclosed document has reference to the following documentations:

Document Reference	Document Title
Act 711	Whistleblower Protection Act 2010
CSD-4-POL- Code of Conduct Policy-v5	Code of Conduct
CSD-4-POL-Gifts and Entertainment Policy-v2	Gifts and Entertainment Policy
UM-5-POL-Anti-Corruption-v1	Anti- Corruption Policy

Distribution:

The enclosed document should be made available in the Corporate Website and UNet.

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Abbreviation

Abbreviation / Terms	Definitions
AC	Audit Committee
CEO	Chief Executive Officer
CFO	Chief Financial Officer
HOD	Head of Division
HR	Human Resource
IA	Internal Audit

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Policy Content

1. Policy Statement

- 1.1 U Mobile Sdn. Bhd. and its subsidiaries (collectively referred to as the “**U Mobile Group**”) are committed to the highest standard of integrity, openness, and accountability, including a zero-tolerance approach towards bribery and corruption, in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible, and transparent manner.
- 1.2 Recognizing the above-mentioned values, U Mobile Group has a secure and confidential channel for all its employees and members of the public to report any integrity concerns without fear of victimization or retaliation.

2. Scope and Applicability

- 2.1 This U Whistleblower Policy ("**Policy**") is applicable to members of the public and any persons working for or on behalf of U Mobile Group in any capacity, such as employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party intermediaries and business partners, sponsors, or any other person associated with U Mobile Group, wherever located.
- 2.2 This whistleblowing channel may be used for reporting actual or suspected irregularity or misconduct of a general, operational, or financial nature ("**Improper Conduct**") within U Mobile Group such as:
- Fraud
 - Bribery or corruption
 - Theft or embezzlement
 - Breach of customer confidentiality or privacy
 - Conflict of Interest
 - Unauthorized use of confidential information of the company
 - Non-compliance with company policies and procedures
 - Concealment of any of the above
- 2.3 Any employee who suspects or becomes aware of any non-compliance or violation of the U Mobile Group's Code of Conduct, Gifts and Entertainment Policy, Anti-Bribery and Corruption Policy or any other relevant policies, procedures and guidelines is obligated to report such incidents to the Internal Audit ("**IA**") Department through the whistleblowing channels (see item 5 below). Alternatively, employees may report to the Compliance Officer, HOD or HR, who will in turn inform the IA team about such reports. Employees who knowingly fail to report such violations may be subject to disciplinary action.
- 2.4 The procedures to manage grievances or complaints in which the “complainant” is personally affected differ from the whistleblowing procedures. The whistleblower is typically not directly or

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personally affected by the Improper Conduct. The “complainant” is recommended to channel any concerns through the established staff grievance procedures at Corporate Services for remediation.

- 2.5 Some sensitive matters may have different procedures for reporting any misconduct or wrongdoing such as sexual harassment. In these circumstances where there are specific procedures prescribed, those specific procedures shall apply.

3. Confidentiality and Protection

- 3.1 IA team or any appointed independent party involved in the investigation (“**Designated Investigators**”) will protect the confidentiality of the whistleblower’s identity as well as the details of the disclosure to the extent reasonably practicable. Reports made through the whistleblowing channel may be done on an anonymous basis. However, U Mobile Group encourages the whistleblower to provide as much information as possible including information listed under item 5.2 below to facilitate the investigation process. The whistleblower is also encouraged to provide a means of contact (email or phone number) in order for the Designated Investigators or IA team to obtain additional information/ documentation to support the investigation.
- 3.2 Exceptions to the confidentiality principle are when U Mobile Group is required by law to disclose information to an external party who is legitimately authorized; or to parties involved in the investigation on a 'need to know' basis including U Mobile Group's external legal advisors for the purpose of obtaining legal advice.
- 3.3 Any person having knowledge or in the course of investigation, obtains knowledge of the disclosure/ whistleblowing shall make all reasonable efforts to maintain the confidentiality of all the details of the disclosure/ whistleblowing, in particular the identity of the whistleblower. The same obligation is applied to the whistleblower in order not to jeopardise any investigation.
- 3.4 U Mobile will protect the whistleblower, to the extent reasonably practicable, from victimization or retaliation from any U Mobile employee at all levels. The whistleblower will be accorded with the above commitment provided the disclosure is made in good faith. Such commitment is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and/or the rules and procedures involved.
- 3.5 If a whistleblower reasonably believes that the whistleblower is being subjected to reprisal, including harassment and victimisation, as a consequence of whistleblowing, that whistleblower may consult or report to any of the following appointed persons:
- AC members;
 - Chief Executive Officer, Chief Financial Officer, or Compliance Officer;
 - Head of IA.

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The same procedures of investigation shall be applied to any complaints of reprisal, including harassment and victimisation. If such complaints are proven to be due to the disclosure made or the whistleblowing action taken, the employee(s) involved shall be subject to disciplinary action.

3.6 Whistleblower protection will be revoked if IA is of the opinion, based on its investigation or in the course of its investigation that –

- a) The disclosure of Improper Conduct was not made in good faith;
- b) The whistleblower has participated in the Improper Conduct disclosed;
- c) The whistleblower willfully made in the disclosure of Improper Conduct a material statement which the whistleblower knew or believed to be false or did not believe to be true;
- d) The disclosure of the Improper Conduct is frivolous or vexatious;
- e) The disclosure of the Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
- f) The whistleblower breaches obligations of confidentiality under this Policy.

Any employee who has participated in an Improper Conduct may be subject to disciplinary action. However, in certain circumstances within the AC's jurisdiction, the AC may, in its discretion, on a case by case basis decide to grant leniency to the Employee or consider leniency for the Employee. However, the U Mobile Group does not condone illegal activities or any breach of the Code of Conduct.

4. Investigations

4.1 U Mobile Group will conduct an appropriate investigation in the most objective and professional manner.

4.2 The investigation conducted by IA or Designated Investigators, and the process is as illustrated in **Appendix I**.

4.3 The action taken by U Mobile Group will take into consideration the nature of the report and Improper Conduct and the matter may be:

- (a) Investigated internally;
- (b) Referred to the police or relevant authorities;
- (c) Referred to external counsels or auditors; and/or
- (d) Form the subject of an independent inquiry.

4.4 IA aims to respond, within a reasonable time upon receiving a report, to the whistleblower (if the identity is provided).

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5. Whistleblowing Channels

5.1 U Mobile’s whistleblowing channels are always available 24 / 7 and the following channels can be used:

- (1) Email: whistleblower_um@u.com.my
- (2) On-line submission through the form below:

Kindly fill in the form below on the information that you wish to bring to our attention.
We will process your information and notify you of the outcome as soon as possible. Please note that should you choose to remain anonymous, we will not be able to revert to you.

<p>Name of person making the disclosures/report*: <input style="width: 95%;" type="text"/></p> <p>Contact Information e.g. e-mail address, office contact/mobile/home): <input style="width: 95%;" type="text"/></p> <p>Attachments (Max: 5MB): <input type="button" value="Choose File"/> No file chosen</p>	<p>Description of disclosures/reports*: <small>(Please provide as much details as possible, including evidence of your disclosures/reports if any)</small></p> <div style="border: 1px solid #ccc; height: 100px; width: 95%;"></div>
<p>Please enter the letters displayed: 2TGHZU <input style="width: 100px;" type="text"/> <small>Click to change</small></p>	
<p><small>*required fields</small></p> <div style="display: flex; justify-content: center; gap: 20px;"> <input type="button" value="Clear"/> <input type="button" value="Submit"/> </div>	

(3) By Mail in a sealed envelope marked “**Confidential**” addressed to the Head of IA at the following address:

U Mobile Sdn. Bhd.
Internal Audit Department
Lot 11.01, Level 11, East,
Berjaya Times Square,
1, Jalan Imbi,
55100 Kuala Lumpur
Malaysia

5.2 Please provide us as much information as possible such as:

- Nature of the Improper Conduct;
- Name of person(s) involved in the Improper Conduct;
- Date and location of the Improper Conduct;
- (Possible) witnesses to the Improper Conduct;
- Evidence of the Improper Conduct e.g. documents, emails, or voice recordings etc.

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The Head of IA or the Designated Investigators may approach the whistleblower for any additional information/ documentations that is required for the investigation.

- 5.3 The CEO, CFO and/or Compliance Officer will be kept informed of any whistleblowing report or the status of the investigations where they are not implicated (to the extent possible, without the disclosure of the identity of the whistleblower and the person who allegedly committed the improper conduct) so that any interim corrective measure (if applicable) regarding any Improper Conduct can be taken immediately.

6. Oversight & Ownership

- 6.1 The AC has overall responsibility for this Policy and shall oversee the implementation of this Policy.
- 6.2 The AC has delegated day to day responsibility for the administration and implementation of the Policy to the Head of IA. The use and effectiveness of this Policy shall be regularly monitored and reviewed by the Head of IA.
- 6.3 The Head of IA is responsible to incorporate any amendments and updates into this document, obtaining the approval of the AC for those amendments and updates.
- 6.4 Any queries relating to this Policy should be directed to the Compliance Officer or the Internal Audit Department.
- 6.5 U Mobile Group reserves the right to amend, update or replace this Policy or any part of it from time to time based on legislative requirements and other circumstances. Such amendments or replacement shall be binding on all employees and third parties including business partners, where applicable.

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Appendix

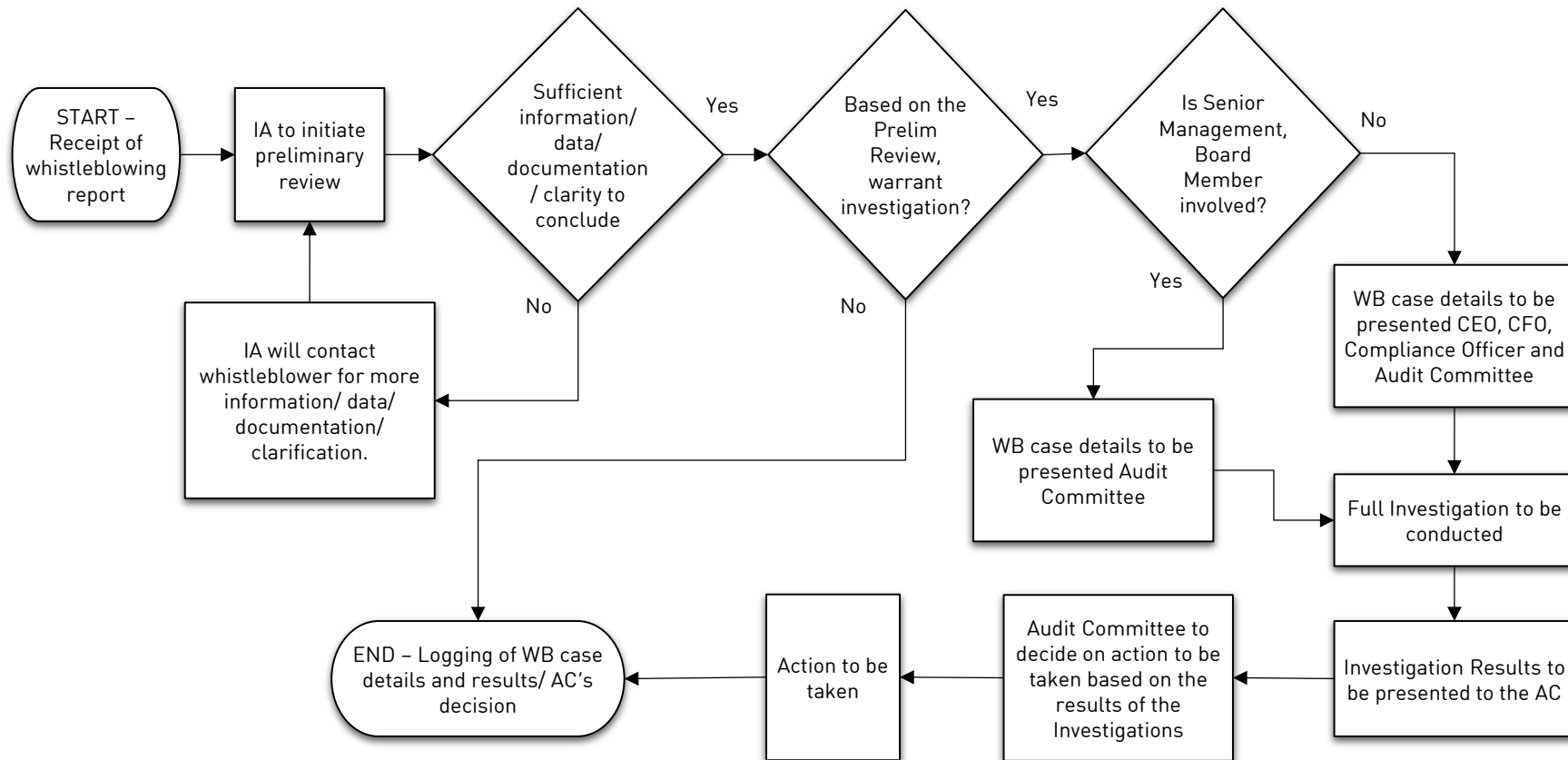
Document Title	File Attachment
<i>Appendix I – Investigation Process flow</i>	-

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Appendix I – Investigation Process Flow



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