

# Whistleblowing

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## POLICIES & PROCEDURES

All employees are urged to promptly report illegal or unethical behaviour, including financial misconduct and other violations' of this Code. All concerns or complaints made by the employees will be kept confidential and their identity will be kept anonymous, though they may be required by law to reveal this information in some circumstances. Brahim's SATS Food Services will not allow any retaliation against employees if they report misconduct of others in good faith.

(Article 10 of Code of Business Ethics, Brahim's SATS Food Services)

## **WHISTLEBLOWING POLICY**

### **POLICY STATEMENT**

Brahim's SATS Food Services Whistleblowing Policy is a mechanism to encourage genuine and legitimate concerns to be raised by all employees and to disclose information which he reasonably believes shows malpractices or impropriety. The Whistleblowing Policy is intended to cover matters which are of employee concern and may also lead to the invocation of other internal procedures including disciplinary proceedings.

### **EFFECTIVE DATE OF THE POLICY**

This policy shall take effect from one month after the date of this Whistleblowing Policy is launched unless the act reported is criminal in nature and subject to criminal prosecutions.

### **SCOPE OF THE POLICY**

This policy is designed to facilitate employees where the concerns that should be reported are:-

- 1) Unauthorised use of Company's money, properties and/or facilities;
- 2) Abuse of position;
- 3) Commission of fraud and/or corruption;
- 4) Involvement in conflict of interest and/or business opportunities positions;
- 5) Commission of unlawful acts;
- 6) Non-compliance with Company's policies and procedures and/or code of conduct;
- 7) Exposure of Company's properties, facilities and/or staff to the risk of safety and security;
- 8) Commission of acts which intimidate, harass and/or victimise any members of the Board of Directors, Management or staff of the Company;
- 9) Fraud;
- 10) Bribery;
- 11) Theft or embezzlement.

The above list is not exhaustive and includes any act or omissions which include item listed within Code of Business Ethic and also other Terms & Conditions of employees which are in place.

Nothing in this policy shall invalidate Grievance Procedures and other Disciplinary Procedure. There is also concern which should not be reported:-

- 1) False and malicious concern
- 2) Defamation concern
- 3) Concern without any basis or insufficient evidence

## **REPORTING PROCEDURES**

BSFS Whistleblowing Policy	
Type of offence	
Name of person/persons involved	
Time & date	
Location	
Fact of the case	

## **PROCEDURE IN MAKING DISCLOSURE**

- 1) All disclosures are to be channelled in accordance with the procedures as provided under this policy.

- 2) Protection to Whistle-blower

This policy is to provide an avenue for all employees of BSFS and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection to protect employees and members of the public who report such allegations.

A whistle-blower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistle blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within BSFS, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistle-blower is mistaken as to the facts and rules and procedures involved.

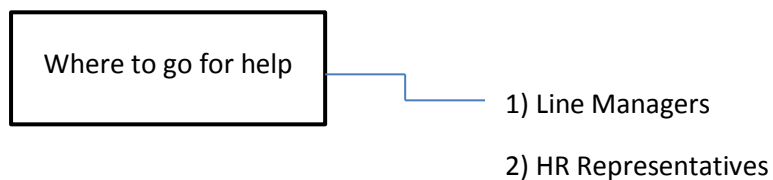
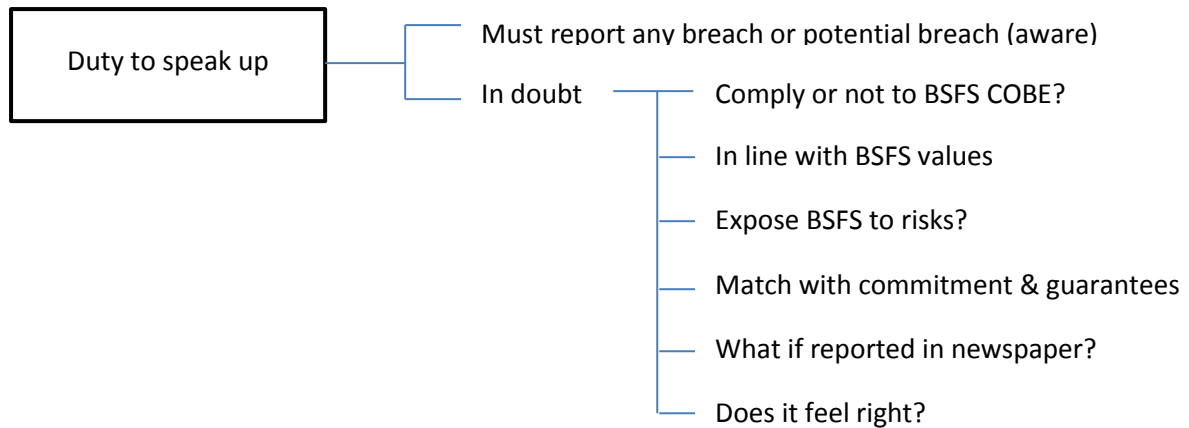
- 3) Anonymous Whistle-blower

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary its right to investigate into any anonymous disclosure.

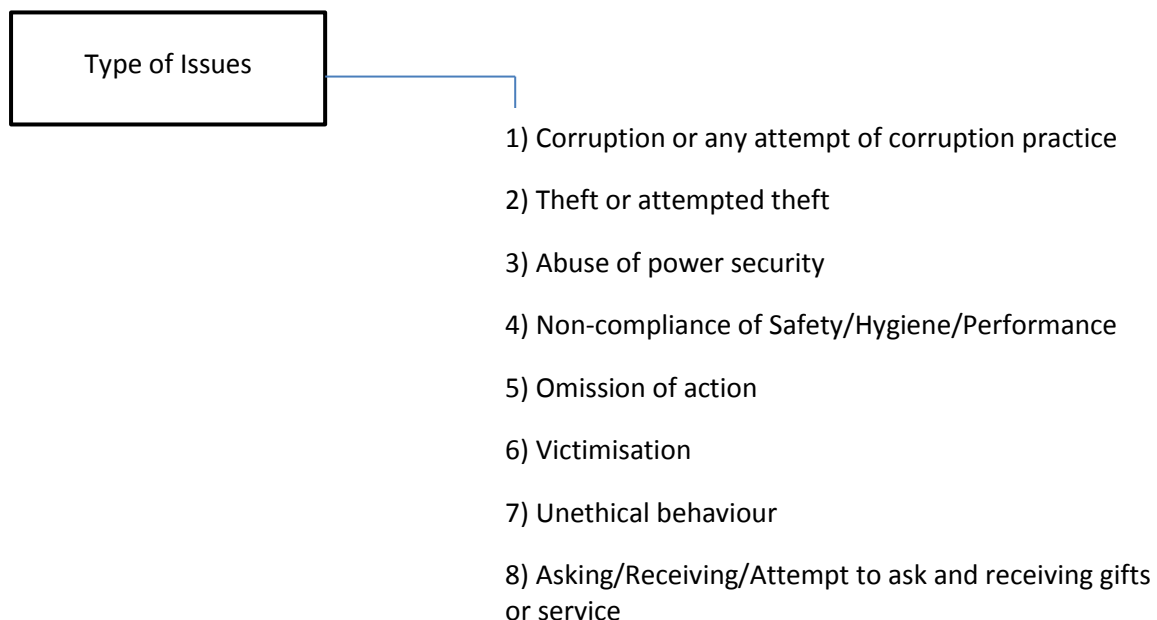
- 4) Notification

Upon the completion of the whistleblowing process and procedures, the whistle-blower will be accorded the privilege to be notified on the outcome of the disclosure.

## WHISTLEBLOWER'S POLICY



\* if you feel uncomfortable, forward your report straight to Director of Human Resource at 019-3161080 or e-mail [yusof.awang@brahimsats.com](mailto:yusof.awang@brahimsats.com)



**FLOWCHART OF WHISTLEBLOWER'S POLICY**

