

BCCK WHISTLEBLOWING POLICY

BCCK is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

SCOPE OF THE POLICY

This policy is designed to facilitate employees and directors (executive & non-executive) of BCCK and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- Fraud;
- Bribery;
- Abuse of Power;
- Conflict of Interest;
- Theft or embezzlement;
- Misuse of Company's Property;
- Non-Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under BCCK's Code of Ethics or any criminal offence under relevant legislations in force.

This policy is not to invalidate the HR disciplinary action process and procedures but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to BCCK.

Only genuine concerns should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from any malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.

If the investigation later revealed that the disclosure was made with malicious intent, appropriate action can be taken against the whistleblower.

The whistleblower who wishes to withdraw his/her disclosure is required to write to the relevant Reporting Channel and provide reason(s) for the withdrawal. Nevertheless, BCCK reserves the right to proceed with investigation on the subject matter of the disclosure.

PROCEDURES IN MAKING A DISCLOSURE

(i) REPORTING CHANNELS

Disclosure can be made to ANY of the following reporting channels, in strict confidential manner:

- Email: email to whistle@bcck.com.my
In Person: in person to Chief Executive Officer / Chief Financial Officer / Director of Human Resource
In Writing: in writing to BCCK Whistleblowing Committee, Borneo Convention Centre Kuching, The Isthmus, Sejingkat, 93050 Kuching.
Hotline: Hotline at 082 392 888 from Monday to Friday during office hour (8.30am – 5.30pm)

(ii) DISCLOSURE OF IDENTITY

In order to enable BCCK to accord the whistleblower with the necessary protection under this policy and also to obtain more details pertaining to the disclosure, the whistleblower is required to disclose his/her personal details as follows:

- Name;
- NRIC No. / Passport No.;
- Contact Details – Office Contact/Mobile No/Home No/Email address

These personal details will be kept confidential.

(iii) CONTENT OF THE DISCLOSURE

Any disclosure made herein should contain the following information:

- Details of the person(s) involved;
- Details of the allegation;
 - Nature of the allegation;
 - Where and when the alleged misconduct/ wrongdoing took place;
- Other relevant information; and
- Any supporting evidence if available.

(iv) ANONYMOUS WHISTLEBLOWER

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

(v) PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection under the policy provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

The protection to the whistleblower can be revoked under the following circumstances, among others:

- The whistleblower participated in the improper conduct;
- The whistleblower wilfully discloses a false statement;
- The disclosure is made with malicious intend; and/or
- The disclosure is frivolous or vexatious.

(vi) NOTIFICATION

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.