



IJM Corporation Berhad

WHISTLEBLOWING POLICY

Title: Whistleblowing Policy		
Effective Date: 1 June 2025	Version: 1.2	Updated: 20 April 2020
	Version: 2.0	Updated: 17 November 2022
	Version: 3.0	Revised: 29 May 2025
Content Owner: Internal Audit Department		

IJM Corporation Berhad

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1.0 INTRODUCTION

- 1.1 IJM Corporation Berhad ("**IJM**") and its subsidiaries (collectively referred to as the "Company") is committed to conducting its business professionally, ethically and with the highest standard of integrity, consistent with its Code of Conduct, policies and procedures, and applicable laws and regulations. Employees must also observe all laws and regulations that govern all of the matters covered in this Policy. In the event of a conflict between the content of this Policy and any applicable law, the applicable law shall prevail and employees shall comply with the applicable law. In line with good corporate governance practices and with the introduction of the Whistleblower Protection Act 2010, IJM has established a whistleblowing reporting channel and the Board and Management of IJM encourage its employees, third parties and members of the public to report any suspected and/or real misconduct, wrongdoings, corruption and instances of fraud, waste and/or abuse involving the resources of the Company (collectively referred to as "improper conduct").
- 1.2 Personal and/or work-related grievances are not considered a subject matter under this Policy. Grievances which include conflict with other employees, dissatisfaction about increment, bonus, promotion, transfer etc., shall be directed to Human Resource Department ("HR").

2.0 OBJECTIVES

- 2.1 The objectives of this Policy are to:
- a. Provide and facilitate a consistent and systematic process for managing any actual or potential improper conduct;
 - b. Assist in ensuring that the misconduct, wrongdoings, corruption and instances of fraud, waste and/or abuse are identified and dealt with appropriately;
 - c. Encourage all employees, third parties and members of the public to raise genuine concerns and complaints on suspicious circumstances as early as possible in their knowledge that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected;
 - d. Provide all employees, third parties and members of the public as to how to raise genuine concerns; and
 - e. Reassure all employees, third parties and members of the public that they should be able to raise genuine concerns without fear of reprisals.



3.0 DEFINITION AND SCOPE OF IMPROPER CONDUCT

3.1 Improper Conduct

Any conduct which if proven, constitutes a disciplinary offence or a criminal offence.

3.2 Corruption

The Malaysian Anti-Corruption Commission Act 2009 provides that any person, whether on his/her own account or in conjunction with another person, if among others, he/she corruptly gives, promises, offers to any person for the benefit of that person or of another person, any gratification as an inducement to, or reward for, among others, any officer of a public body doing or forbearing to do anything in respect of any matter or transaction, actual or proposed or likely to take place, in which the public body is concerned, commits an offence.

In line with the Company's zero tolerance approach against all forms of bribery and corruption, the Company has put in place the Anti-Bribery and Corruption System ("ABCS") to consolidate various policies, procedures and processes in relation to bribery and corruption. Any non-compliance with ABCS policies, procedures and/or processes is taken seriously and constitutes a serious misconduct or offences warranting disciplinary action against the offenders, including termination in appropriate circumstances and further consequences under the applicable law.

3.3 Fraud

Fraud is the act of making false representations of material facts, whether by words or conduct, by concealing information, or by making misleading statements in order to obtain some benefit or payment that would otherwise not exist.

Fraud includes (but not limited to) any questionable accounting practices or irregularities in the Company's reported financial statements and non-compliance with the Company's internal financial controls.

These acts may be committed either for the wrongdoer's benefit or for the benefit of some other party. These acts must have been committed knowingly, wilfully and intentionally.

3.4 Waste

Waste is spending money or using resources on goods or services in excess of actual need. Waste does not typically produce a benefit, and is an act of poor management of funds.

3.5 Abuse

Abuse consists of practices that cause unnecessary costs to the Company. Abuse can be similar to fraud, except that it is not necessary to prove that abuse was performed knowingly, wilfully and intentionally.



- 3.6 The scope of improper conduct also extends to any person who knowingly assists, aids, abets, or conspires with another person to commit any of the items referred to in Clauses 3.1 to 3.5. This includes but not limited to providing information, resources, or any form of support that enables or facilitates the commission of an improper act. An attempt to conceal, or assist in concealing, any of the above is also considered an offence.

4.0 WHO IS A WHISTLEBLOWER

- 4.1 A Whistleblower is defined as any person including but not limited to Board of Directors, employees, third parties or members of the public who makes a complaint of improper conduct(s) that has occurred within the Company.

The whistleblowing reporting channel serves as an avenue for reporting and it is in line with the Whistleblower Protection Act 2010.

Only genuine concerns of any suspected and/or real misconduct should be reported via the whistleblowing reporting channel. The complaint should be made in good faith with a reasonable belief that the information relating to the same is substantially true, and not for personal gain. A complaint can be made even if the Whistleblower is not able to identify a particular person involved in the improper conduct.

5.0 PROTECTION

5.1 Anonymity

The Whistleblower may make a complaint/report of improper conduct anonymously but if the Whistleblower's identity and details are made known, it shall be kept confidential. However, anonymous reports are not encouraged as it would be difficult to follow up with the Whistleblower for investigation purposes. Additionally, it is difficult to provide protection to the Whistleblower as outlined in this section.

5.2 Protection Against Detrimental Action

The Whistleblower shall be protected against detrimental actions in reprisal for disclosure of an improper conduct i.e., not limited to interference with the lawful employment or livelihood of the Whistleblower, including discrimination, intimidation, harassment, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the Whistleblower's employment, career, profession, trade or business or the taking of disciplinary action.

Additionally, it is the Company's policy that no disciplinary action will be taken against the Whistleblower as long as the report was made in good faith, i.e., without malicious intent.



5.3 Protection of Confidential Information

The Company shall treat all disclosures and reports as confidential and will only disclose such information on a “need to know” basis or if compelled by law, court or relevant authorities.

The above also applies to any person who makes or receives a disclosure of improper conduct or obtain confidential information in the course of investigation.

Confidential information includes the following:

- a. Information about the identity, occupation, residential address, work address or whereabouts of Whistleblower; and the person against whom the Whistleblower has made a complaint;
- b. Information disclosed by the Whistleblower, witnesses or other party such as document owners; and
- c. Information that, if disclosed, may cause detriment to any person.

5.4 Immunity from Civil or Criminal Liability

In line with the Whistleblower Protection Act 2010, a Whistleblower who makes a disclosure of improper conduct in good faith, shall not be subject to any civil or criminal liability.

5.5 Other Forms of Protection

The Whistleblower shall also be adequately protected against the following:

- a. Action causing injury, loss or damage.
- b. A threat to take any of the actions above.

Additionally, a Whistleblower may seek protection from any other enforcement agencies and any Federal or State Government departments or other persons as the enforcement agency deems appropriate. Any party that retaliates against the Whistleblower who has reported a wrongdoing in good faith may be subjected to appropriate action, up to and including legal action, where applicable.

5.6 Relocation

The Whistleblower may request for a relocation of his/her place of employment, subject to the discretion of the Company.

For the avoidance of doubt, the protection conferred above is:

- a. Still valid if the disclosure does not result in disciplinary action or prosecution of the person about whom the improper conduct was reported or/and;
- b. Restricted to the Whistleblower reporting any improper conduct as stipulated in this Policy.



6.0 REVOCATION OF WHISTLEBLOWER PROTECTION

- 6.1 The protection under 5.1 to 5.6 above shall be automatically revoked, if:
- The Whistleblower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud, waste, and/or abuse;
 - The Whistleblower wilfully made his/her disclosure, knowing or believing the information is false or untrue;
 - The disclosure is frivolous or vexatious;
 - The disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
 - The Whistleblower in the course of making the disclosure or providing further information, commits an offence under the Whistleblower Protection Act 2010.

7.0 DISCLOSURE OF IMPROPER CONDUCT VIA WHISTLEBLOWING REPORTING CHANNELS

- 7.1 Purpose of Whistleblowing (“WB”) Reporting Channels – To provide an avenue to enable any person to report improper conduct in good faith and without fear of retaliation.
- 7.2 Avenue for reporting and methods - A complaint or report of improper conduct or suspected improper conduct may be made to any one of the following channels:

WB Reporting Channels	Description	Recipients
Designated email	ijmwb@ijm.com	<ul style="list-style-type: none"> Chairman, Audit Committee (“AC”) Group Chief Executive Officer and Managing Director (“GCEO&MD”) Chief Audit Executive (“CAE”)
In writing	<p><u>Address</u></p> <p>Wisma IJM, Jalan Yong Shook Lin, 46050 Petaling Jaya, Selangor.</p>	

To report an improper conduct, the person making the report may fill up a Whistleblowing Form (**Appendix 1**) and submit via the dedicated whistleblowing channels. The form can also be downloaded from iPortal or IJM website (www.ijm.com).

If the disclosure concerns any of the personnel mentioned above, the Whistleblower should report the matter directly to the Chairman of the Board.

If an improper conduct is disclosed to a superior/ Head of Department/ Head of Division or Human Resource (“HR”), the recipient shall ensure that the disclosure is forwarded to the designated whistleblowing channels for further action.



8.0 INFORMATION REQUIRED

- 8.1 Information in the Whistleblower complaint/report - A complaint or report shall have the following information:
- a. Details of the personnel/individuals involved in the improper conduct which include names, designation, department, company, phone numbers, email addresses etc.
 - b. Nature of the improper conduct or concern (what and how).
 - c. Time and location of the incident.
 - d. Evidence and/or any related supporting documents e.g., receipts, photos, transaction records, email trails etc.

9.0 POLICY REVIEW

- 9.1 The policy will be reviewed as and when necessary or at least once every 3 years.



Whistleblowing Policy

Appendix 1 – Whistleblowing Form

Section 1: Whistleblower Details			
Name		Phone No.	
Designation		Email Add.	
Department		Company	
<i>(Person who choose to submit anonymous report is not required to complete the details in Section 1)</i>			
Section 2: Details of Individuals Involved in Improper Conduct			
Name		Phone No.	
Designation		Email Add.	
Department		Company	
Section 3: Details of Improper Conduct			
Date of Incident		Time of Incident	
Location			
Details of Incident/ Misconduct			
How did you know about it?			
<i>(Attachment of any evidence or supporting document for the incident of improper conduct reported in Section 3 is highly encouraged.)</i>			
Section 4: Details of Witness (If any)			
Name		Phone No.	
Designation		Email Add.	
Department		Company	
Section 5: Declaration			
a. I confirm to the best of my knowledge that all information provided in this Form is true.			
b. I hereby agree that the information provided herein to be used and processed for investigation purposes.			
Name: Date:		Signature	