



**PARAGON GLOBE BERHAD**

**百 丽 环 球**

194801000095 (1713-A)

## **WHISTLEBLOWING POLICY**

**(VERSION 2.0)**

**APPROVED BY THE BOARD OF DIRECTORS OF THE COMPANY ON 26 MAY 2022**

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## 1. POLICY STATEMENT

- 1.1 Paragon Globe Berhad ("PGB" or the "Company") and its subsidiaries ("Group of Companies") are committed to the highest standard of integrity, openness and accountability in the conduct of its business activities and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.
- 1.2 Recognising the abovementioned values, PGB and its Group of Companies aim to establish a transparent and accountable communication channel for all of its employees and members of the public (where relevant) to disclose any improper conduct and/or potential wrongdoings within PGB and its Group of Companies in an effective and secured manner.

## 2. OBJECTIVE

- 2.1 This Policy applies to PGB and its of Group of Companies and is intended to encourage all employees (whether permanent, contract, part-time or casual), directors, shareholders, consultants, vendors, contractors, external agencies or any parties which have business relationship with PGB or its Group of Companies to report suspected or actual occurrence(s) or genuine concerns in relation to the breach of a legal obligation, miscarriage of justice, unethical or inappropriate events (behaviours or practices), danger to health, safety and environment and to cover up of any of these incidences in its business or affairs or at the workplace openly and honestly without retribution.

## 3. DEFINITIONS

- 3.1 In this Whistleblowing Policy, the following terms shall have the following definitions: -

<b>“Board of Directors”</b>	Means the Board of Directors of Paragon Globe Berhad.
<b>“Chairman”</b>	Means the Chairman of Paragon Globe Berhad.
<b>“Company”</b>	: Means Paragon Globe Berhad and its Group of Companies.
<b>“Employees”</b>	: Means all board of directors, shareholders, executive officers, members of management, permanent or contract's employee working and under the control of the Company.
<b>“Stakeholders”</b>	: Means all suppliers, contractors, agents, consultants or any business partner which has direct dealings with the Company.
<b>“Whistleblowing Policy” or “Policy”</b>	: Means this whistleblowing policy including any subsequent revisions and supplemental guidelines.
<b>“Whistleblower”</b>	: Means the person who discloses or reports possible improprieties or potential wrongdoings and/or activity within an organisation which is deemed illegal, improper or unethical.
<b>“Whistleblowing”</b>	: Means the voluntary disclosure or action of reporting a possible improprieties or potential wrongdoings of an activity which is deemed illegal, improper or unethical.

#### 4. SCOPE AND APPLICATION

4.1 This Policy is designed to facilitate the Employees and Stakeholders acting in good faith to disclose any possible improprieties or potential wrongdoings occur in the course of the Company's business or affairs or at any workplace. Following are generally accepted as improper and reportable conduct for whistleblowing of which the list is not exhaustive: -

- (i) Fraud;
- (ii) Corruption, bribery or blackmail;
- (iii) Criminal offences;
- (iv) Violation or failure to comply with law and regulation;
- (v) Breach of the Company's policies, practices, procedures or other rules of conduct;
- (vi) Misuse of Company's information;
- (vii) Miscarriage of justice;
- (viii) Any act of conflict of interest;
- (ix) Forgery or alteration of any document or account belonging to the Company;
- (x) Misappropriation or theft of funds, supplies or other assets;
- (xi) Abuse of power by any Employees or Stakeholders of the Company;
- (xii) Serious financial irregularity or impropriety;
- (xiii) Endangerment of an individual's health and safety;
- (xiv) Sexual or any form of harassment in the workplace; and
- (xv) Concealment of any or a combination of the above.

#### 5. REPORTING PROCEDURES

5.1 Employees and Stakeholders should report their concern at the earliest opportunity in order for the appropriate action to be taken in accordingly.

5.2 Whistleblower shall have option to report or escalate the concerns or any wrongdoing through the following channels: -

- (i) Email to:
  - (a) Attention : Mr Tee Boon Hin  
Designation : Audit Committee Chairman (Senior Independent Non Executive Director)  
Email : [boonhin.tee@pgbgroup.com.my](mailto:boonhin.tee@pgbgroup.com.my)
  - (b) Attention : Dato Sri' Godwin Tan Pei Poh  
Designation : Group Executive Director  
Email : [godwin.tan@pgbgroup.com.my](mailto:godwin.tan@pgbgroup.com.my)
- (ii) Letters/documents/reports (in sealed envelope with labelled "STRICTLY PRIVATE AND CONFIDENTIAL TO BE OPENED BY THE ADDRESSEE ONLY") to be addressed to:  
Compliance Department  
No. 10-02, Level 10,  
Grand Paragon Hotel,  
No.18, Jalan Harimau, Taman Century,  
80250 Johor Bahru, Johor.

5.3 To facilitate the investigation, all disclosures shall be in writing using the "Whistleblowing Form" as appended in "Appendix 1" (i.e. hardcopy letter ore-form). The following information should be included when making a disclosure to enable the Company to accord the necessary protection under this Policy and to obtain further details pertaining to the Whistleblowing Form:

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- (i) Whistleblower's identity;
- (ii) Brief description or nature of the alleged event or matter;
- (iii) The date, time and place of the alleged event or matter
- (iv) Wrongdoer's identity;
- (v) Particulars of witness (if any);
- (vi) Supporting evidence or documentation; and
- (vii) Other details deemed to be useful to facilitate the investigation.

5.4 Anonymous disclosure may be considered at the discretion of the recipients. In exercising this discretion, the factors to be taken into account would include:

- (i) the seriousness of the issue raised;
- (ii) the credibility of the concern; and
- (iii) the likelihood of confirming the allegation from other sources

5.5 Although the Whistleblower is not expected to prove beyond reasonable doubt the truth of the disclosure, the Whistleblower shall need to demonstrate that there are reasonable grounds for his / her concern and provide sufficient information for the Group to take appropriate steps.

5.6 For the avoidance of doubt, all disclosures made under this Policy will be dealt with in a confidential manner.

5.7 In the event the matter relates to any of the member of the Compliance Function, he or she shall abstain himself/herself from the all review, discussion and decision for the investigation process.

## **6. INVESTIGATION PROCESS**

6.1 Upon receiving of the Whistleblowing Form, a Whistleblowing Investigation Team comprising the qualified personnel (having due regard to suitable seniority or any circumstances that may give rise to conflicts of interest) will be established to assess and investigate the concerns disclosed in the Whistleblowing Form in a fair and objective manner. The Whistleblowing Investigation Team will conduct a preliminary investigation of every Whistleblowing Form to determine whether there are merits to a further investigation.

For the avoidance of doubt, the Whistleblowing Investigation Team may obtain further information from the Whistleblower, the wrongdoer or from other parties as deemed necessary for and by the scope of the investigation.

If the outcome of the finding by the Whistleblowing Investigation Team results in a proven case of wrongdoings, the Whistleblowing Investigation Team shall prepare a Whistleblowing Investigation Report and immediately refer and report the same to the Executive Chairman. The Executive Chairman shall then have the authority to make the final decisions.

- 6.2 In the event the wrongdoing implicates the Executive Chairman, the Whistleblowing Investigation Report shall be made available to another director of Paragon Globe Berhad or any personnel designated and authorised by the Board of Directors (collectively referred to as "the Appointed Officer") in order to prevent any conflicts of interest and biasness to the fact finding/ investigation process. The Appointed Officer shall after investigation, made a recommendation to the Board of Directors. The Board of Directors shall have the authority to make the final decisions regarding the disclosure of wrongdoing by the Executive Chairman.
- 6.3 Upon reviewing of the finding, the Executive Chairman or the Board of Director (as the case may be), may: -
- (i) Reject the Whistleblowing Investigation Report and instruct the matter to be closed;
  - (ii) Direct a further investigation to address the concerns or any part thereof having regard to the circumstances of the matter reported or pertaining to any persons involved or implicated;
  - (iii) Direct a further investigation to determine the next cause of action or for consideration under other internal procedures or disciplinary procedures or corrective action, if appropriate and applicable;
  - (iv) Suspend the alleged wrongdoer or any other implicated person from work to facilitate any further investigation or to avoid any Employees or Stakeholders of exposure to threat or harm; and
  - (v) if the investigation discloses a possible criminal offence, the matter to be referred to the appropriate enforcement authority.
- 6.4 All investigation's outcome shall be tabled to the Risk Management Committee ("the Committee") wherein the final report together with the recommendation will be review by the Committee.
- 6.5 If the Risk Management Committee is of the view that the matter has not been satisfactorily resolved which results in a breach of Main Listing Requirements, Risk Management Committee shall promptly report the matter to Bursa Malaysia Securities Berhad.
- 6.6 The identity of the Whistleblower shall be kept in strict confidence. Subject to any prohibition or any legal requirements, the Committee shall inform the Whistleblower that the investigation has been completed and the action or decision has taken by the Company. As the findings are confidential, the details of the findings will not be disclosed to the Whistleblower.

## **7. PROTECTION TO WHISTLEBLOWER**

- 7.1 A Whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. The whistleblower will be protected under the Whistleblower Protection Act 2010 if he or she makes a disclosure in good faith to an enforcement agency. The identity of the Employees or Stakeholders including all personnel directly or indirectly working pertaining to the whistleblowing case shall be strictly protect and kept confidential so long as it does not impede or frustrate the investigation. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions, dismissal, harassment, victimization or informal pressures arising from making the disclosure in good faith for any improper conduct committed or about to be committed within the Company, to the extent reasonably practicable. 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.

## **8. MAINTAIN OF RECORDS**

- 8.1 Compliance Function shall maintain records of disclosure as well as other investigation related documents for whistleblower.

## **9. OTHER RELEVANT DOCUMENTS**

This policy must be read in conjunction with the Paragon Globe's Anti-Bribery and Anti- Corruption Policy ("ABC Policy") and other related policies. The Whistleblowing Form must be used to disclose any wrong-doings.

## **10. REVIEW OF THE POLICY**

- 10.1 This Policy shall be reviewed at least once for every three (3) years, as and when necessary to ensure its relevance and effectiveness in keeping with the Company's changing business environment, administrative or operational needs as well as changes to the legislations. Any changes to the Policy, if any, shall be submitted to the Risk Management Committee for review and be recommended to the Board of Directors for approval in writing.
- 10.2 In the event any part of the Policy is inconsistent with the law of Malaysia, the law of Malaysia shall prevail.

*This Whistleblowing Policy has been reviewed and approved by the Board on 26 May 2022.*

**APPENDIX 1**

**PARAGON GLOBE BERHAD**

**(REGISTRATION NO: 194801000095 (1713-A))**

**WHISTLEBLOWING FORM**

<b>WHISTLEBLOWING REPORT</b>	
To:	
Incident Date & Time	
Incident Location	
Name of alleged person/ Division /Department	
Description/ Circumstances of alleged incident  (Please provide picture or evidence to support the claim)	
Have you raised your concern to any other person/ department/ authority? (Tick whichever applicable) <input type="checkbox"/> Yes, Name (Dept) / Authority: _____ <input type="checkbox"/> No	
Signature:	
Name:	
Dept/Div/Co:	
Telephone No:	
Date:	





**PARAGON GLOBE BERHAD**

**百 丽 环 球**

194801000095 (1713-A)

**Headquarter Address:**

No.10-02, Level 10, Grand Paragon Hotel, No.18, Jalan Harimau, Taman Century,  
80250 Johor Bahru, Johor

Tel: (+607) 278 6668 Fax: (+607) 278 6666

Email: [enquiry@pgbgroup.com.my](mailto:enquiry@pgbgroup.com.my)

Website: [www.pgbgroup.com.my](http://www.pgbgroup.com.my)

**KL Branch Address:**

No. 9, Lorong Gurney, Off Jalan Semarak, 54100 Kuala Lumpur.

Tel: (+603) 2691 2288 Fax: (+603) 2691 2228