



RISK & COMPLIANCE

WHISTLEBLOWER POLICY AND PROCEDURES FOR BURSA MALAYSIA GROUP

RC/IGCM/P/WPP/01-2022

Version date: 28 April 2022

This document is to be used solely for internal purposes of Bursa Malaysia Berhad and/or the Bursa Malaysia group of companies ("Bursa Malaysia"). This document is owned by Bursa Malaysia. No part of the document is to be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying, recording or any information storage and retrieval system, without permission in writing from owner of the document.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Document Information

Title:	Whistleblower Policy and Procedures for Bursa Malaysia Group	
Reference No:	(RC/IGCM/P/WPP/01-2022)	
Version/ Date:	Version 3.0/ 28 April 2022	
Prepared by:	Integrity & Governance Unit (IGU) of Bursa Malaysia Berhad.	
Approved by:	Board of Directors of Bursa Malaysia Berhad	
Approval date:	28 April 2022	
Consultation with:	Internal Audit and Corporate Governance & Secretarial	
Ownership:	Integrity & Governance Unit (IGU) of Bursa Malaysia Berhad.	
Superseded Versions:	N/A	1. Whistleblower Policy and Procedures For Bursa Malaysia Group 2. Whistleblower Policy And Procedures For Directors

For enquires, authorisation and propose changes, please email to IGU@bursamalaysia.com



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Target Audience	
1	Bursa Malaysia Employees
2	Board of Directors
3	Independent Individuals sitting as members of Board Committees

Revision No.	Description of Change	Revised By	Change Date	Effective Date
1.0	Document Creation	Internal Audit	28 December 2011	28 December 2011
2.0	<ul style="list-style-type: none"> Enhancement of Employee policy. Included document control in Section 1.0. Included Listing Requirement. 	Basheerah Syed Ahmed, SVP Internal Audit	22 April 2020	30 April 2020
3.0	<ul style="list-style-type: none"> Transfer of Ownership from Internal Audit to IGU The oversight function of Whistleblowing Policy & Procedures has been transferred from Audit Committee to RMC. Merge of Whistleblowing Policy & Procedures of Employee and Directors Included Independent Individuals sitting as members of Board Committees within the ambit of application of the Policy Provide the detailed process flow and procedures of the Whistleblowing Policy & Procedures for the Group. 	Mohd Helmey Ahmad, AVP IGU	28 April 2022	28 April 2022



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Table of Contents

1.0	DEFINITIONS AND ABBREVIATIONS	5
2.0	INTRODUCTION.....	7
3.0	WHISTLEBLOWING.....	9
4.0	PROTECTION.....	12
5.0	CONFIDENTIALITY	14
6.0	INVESTIGATION PROCEDURES FOR EMPLOYEES	15
7.0	INVESTIGATION PROCEDURES FOR THE CHAIRMAN, BOARD OF DIRECTORS, CEO OR INDEPENDENT INDIVIDUALS	19
8.0	WHISTLEBLOWER PROTECTION ACT 2010 (“ACT”) AND LISTING REQUIREMENT	20
9.0	CONCLUSION.....	22
10.0	APPENDICES.....	23
	APPENDIX 1 - REPORT OF IMPROPER CONDUCT.....	23
	APPENDIX 2 - WHISTLEBLOWING PROCEDURES FOR BURSA MALAYSIA GROUP (PROCESS FLOW AND PROCEDURES).....	29



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

1.0 DEFINITIONS AND ABBREVIATIONS

In this Policy, stated below are abbreviations and definitions with following meanings, unless the context otherwise requires a separate representation in the document: -

Board of Directors or Board	refers to the Board of Directors of the Company and Group.
CEO	Chief Executive of Officer of the Company
CIGO	Chief Integrity and Governance Officer
Company	refers to Bursa Malaysia Berhad.
Company Chairman	refers to the Chairman of Bursa Malaysia Berhad.
Confidential Information	Any information that is by its nature confidential or sensitive and/or not generally available to the public and, in this Policy, include: (a) Information about the identity, rank, position or other personal details of a Whistleblower; or (b) a person against whom a Whistleblower has made a disclosure; or (c) information disclosed by a Whistleblower; or (d) information that, if disclosed, may cause detriment to any person.
CG&S	Corporate Governance & Secretarial.
Detrimental Action	Refers to any of the following:- <ul style="list-style-type: none"> • intimidation or harassment <u>at workplace</u>; • interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person's employment, career, profession, trade or business or the taking of disciplinary action; and • a threat to take any of the above actions.
Director	Non-executive director of the Company
Director of IA	The person heading the Internal Audit function of the Company
Employees	refers to permanent employees, on contract, temporary or short-term employees, trainees / interns and employees on secondment.
External Parties	An individual or organization other than the Employees, Board of Directors of the Company or Independent Individual
GHR	Group Human Resources.
Group	refers to the Company and its subsidiaries.
IA	Internal Audit.
IGO	Integrity & Governance Officer
IGU	Integrity & Governance Unit of the Company.
Improper Conduct	has the same meaning as provided in Chapter 3.2 .
Independent Individual	An external independent individual who is a member of a Bursa Board Committee established under the Bursa Governance Model, but is not a Director of the Company
Independent Party	An independent third party appointed by the RMC or by the Board to conduct any investigation in respect of any report of Improper Conduct
Listed Companies	corporation whose securities or any class of its securities have gained admission to be quoted on a stock market of a stock exchange
MACC	Malaysian Anti-Corruption Commission.
Management	Immediate supervisors, Heads of Department, Heads of Division and the CEO



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

PDRM	Polis Diraja Malaysia.
Participating Organisations	any person who carries on the business of dealing in securities and is recognized as a participating organization by the rules of the stock exchange;
Policy	refers to the Whistleblower Policy and Procedures for Bursa Malaysia Group
RC	Risk and Compliance of the Company.
RMC	Risk Management Committee.
RMC Chairman	refers to the Chairman of RMC.
SID	Senior Independent Director of the Company.
TOR	Terms of Reference
Trading Participant	a company that carries on the business of dealing in derivatives and is admitted as a Trading Participant under para 3.02 of Rules of Bursa Malaysia Derivatives
Whistleblower	refers to person(s) who can make a report to the Company of any suspected or actual Improper Misconduct that is likely to happen, is being or has been committed. Refer to Chapter 3.1 .
Whistleblowing	the deliberate, voluntary disclosure or reporting of individual or organisational malpractice by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated <u>Improper Conduct</u> within the organisation or by an organisation that is within its ability to control.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

2.0 INTRODUCTION

The Company is committed to the values of transparency, integrity, impartiality and accountability in the conduct of its business and affairs, and in its workplace. To achieve this commitment, the Company has established the Whistleblower Policy and Procedures for Bursa Malaysia Group (**Policy**), as part of the Company's initiative to combat fraud, malpractices, Improper Conduct, bribery and corruption complementing with other related Group's policies and procedures to uphold integrity and the Group's reputation.

2.1 Purpose

- 2.1.1 This Policy is intended to provide an avenue for people to report in good faith any real and genuine concern of any **Improper Conduct** as provided in **Section 3.2** whilst protecting the person making such disclosures from any reprisal and / or detrimental action.
- 2.1.2 This Policy is for the Company's internal use, while certain applicable sections and contents will be published on the Company website, pursuant to Chapter 15 of Bursa Malaysia Securities Listing Requirements pertaining to anti-corruption which came into effect on 1 June 2020 and any other revisions made thereto from time to time.
- 2.1.3 The Policy shall be read together with the Company's Anti- Fraud, Bribery & Corruption Policy and Guidelines, the Code of Ethics and other related policies that are currently in force.
- 2.1.4 For this purpose, the Company shall take the necessary measures to:-
- (a) provide a formal and confidential channel to encourage reports by Whistleblowers of any suspected or actual Improper Conduct to do so safely, securely and with confidence that they will be protected and supported;
 - (b) ensure that disclosures are being dealt with appropriately on a timely basis; and
 - (c) support the Company's values and Code of Ethics in meeting its legal and regulatory obligations.

2.2 Scope

- 2.2.1 The Policy applies to all Employees, the Board of Directors and Independent Individuals.
- (a) It covers any serious concerns reported against any Employee, the Board of Directors or Independent Individual, who has committed an Improper Conduct. Personal grievances concerning an individual employee's terms and conditions of employment or other aspects



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

of the working relationship, such as complaints of bullying or harassment, are to be dealt with under the Company's procedure on grievance management.

- (b) This Policy excludes any Improper Conduct committed by any market participants such as Listed Companies or Participating Organisations or Trading Participants¹.
- (c) Any complaints about the Group, its products and services, the Listed Companies, Participating Organizations or Trading Participants shall be made via **Bursa2U**. Bursa 2U Centre is the frontline for Bursa Malaysia in handling enquiries and complaints. Bursa 2U undertakes all types of related enquiries and complaints on improper conduct and other irregularities in the securities and futures markets.

Such enquiries or complaints can be sent to bursa2u@bursamalaysia.com.

2.3 Ownership

2.3.1 The RMC of Bursa Malaysia is responsible for the oversight of, and is ultimately accountable for this Policy.

2.3.2 The RMC has delegated the day to day responsibility for the administration and implementation of the Policy to the IGU. The use and effectiveness of this Policy shall be regularly monitored and reviewed by the IGU. IGU will refer to the RMC on any matters in accordance with its TOR. When deliberating whistleblowing report, the RMC Chairman will be consulted by the RMC, CIGO, IGO and other division representatives, as required.

2.3.3 The owner of the Policy is IGU who shall be responsible for incorporating any amendments, revisions, and updates into this Policy subject to obtaining the approval of the RMC and the Board and for administering the provisions under this Policy.

2.4 Review and Revision

2.4.1 Provisions in this Policy shall be reviewed and amended whenever necessary to ensure its effective implementation. Any material changes of the policy will be deliberated by the RMC prior to approval by the Board.

2.4.2 Notwithstanding the above, the CIGO shall have the authority to approve any minor, ancillary or consequential amendments.

¹ Any reports of Improper Conduct committed by market participants and/or any breach of the securities laws by any market participant should be channelled to the Securities Commission which is an "enforcement agency" under the Whistleblower Protection Act 2010. As the Company is not recognised by the Legal Affairs Division / Bahagian Hal Ehwal Undang-Undang ("BHEUU") of the Prime Minister's Department (which is the coordinating agency of the Act) as an "enforcement agency" under the Act, any reports made to the Company will not be subject to the protection provided for under the Act.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

3.0 WHISTLEBLOWING

3.1 Who Can Whistleblow?

3.1.1 Any of the following persons, hereinafter referred to as a Whistleblower, who reasonably acting in **good faith**, can make a report to the Company of any suspected or actual Improper Misconduct committed any employee, member of the Board of Directors or Independent Individual within the Company or Group:-

- i. the employees;
- ii. Board of Directors;
- iii. Any business associates which are external parties such as customers, service providers, vendors, suppliers, contractors and other stakeholders who may have a business relationship with the Company and Group; and
- iv. Members of the public.

3.2 What to Whistleblow?

3.2.1 A report can be made if it relates to any **Improper Conduct** which if proven, constitutes a disciplinary issue or a criminal offence by any employee, a member of the Board of Directors or Independent Individual within the Company or Group, including but not limited to any of the following: -

- i. criminal offences by the employee, a member of the Board of Directors or Independent Individual including bribery, fraud, corruption or abuse of power;
- ii. misappropriation of funds , assets, theft or embezzlement or gross mismanagement;
- iii. financial irregularity or impropriety;
- iv. breach of Company's Code of Ethics
- v. act, omission, misrepresentation or concealment of information which lead to, cause or create a substantial or specific danger to the lives, health, or safety of the Group's Employees or the public;
- vi. failure to comply with provisions of laws or regulations;
- vii. serious conflict of interest without disclosure; and
- viii. knowingly assisting, directing or advising a person to commit any of the above Improper Conduct.

3.2.2 The Whistleblower needs to demonstrate that he or she has reasonable grounds for the concerns. However, the Whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure under this Policy.

3.2.3 If the Whistleblower knows as a matter of fact that there are reasonable grounds of suspicion that an Improper Conduct is going to take place, such genuine concern is encouraged to be raised at an early stage.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

3.2.4 It is advisable for a potential Whistleblower to seek advice or guidance from IGU if he or she is unsure whether the alleged misconduct constitutes an Improper Conduct under this Policy or otherwise.

3.3 When to Whistleblow?

As soon as a Whistleblower becomes aware that an Improper Conduct is likely to happen, is being committed or has been committed, the Whistleblower is encouraged to make a report of the Improper Misconduct.

3.4 How to Whistleblow?

3.4.1 A disclosure of an Improper Conduct can be made in writing to the following persons via email or by letter as set out below:-

Person Being Reported	Person to whom the report is directed to (Where Applicable & Appropriate)	
	By Email	Alternatively, the form can be submitted as follows:
Any member of the Board of Directors including Chairman of the Board, CEO, or Independent Individual	<u>Chairman of the Board Chairman@bursamalaysia.com</u> OR <u>Senior Independent Director SID@bursamalaysia.com</u> OR <u>Chairman of RMC RMCChairman@bursamalaysia.com</u>	Disclosure to be enclosed in a sealed envelope marked “ Confidential ” and “ To be opened by ” addressed to the appropriate designated person- Head, Integrity and Governance Unit OR Chairman of RMC Risk and Compliance Bursa Malaysia Berhad Exchange Square Bukit Kewangan 50200 Kuala Lumpur
Integrity & Governance Officer / Chief Integrity & Governance Officer	<u>Chairman of the RMC RMCChairman@bursamalaysia.com</u>	
Employees	<u>whistleblowing@bursamalaysia.com*</u>	

**Note : Only accessible by the RMC Chairman, CIGO and IGO.*


3.4.2 The procedures for an External Party to report an Improper Conduct by an Employee shall be posted on the Bursa Malaysia website. The report received from any External Party will be reviewed in accordance with the investigation procedures set out under this Policy.

3.4.3 In order for the Company to investigate the Improper Conduct being reported, the Whistleblower is to provide important information and sufficient details which includes the following:-



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

- (a) particulars of the Whistleblower i.e. name, NRIC Number, designation (if the Whistleblower is an employee of the Group) and contact particulars (email, telephone or mobile number and/or address);
 - (b) details and description of the Improper Conduct, including its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved.
 - (c) a disclosure may be made even if the Whistleblower is not able to identify the identity of the person(s) involved;
 - i. particulars of witnesses, if any; and
 - ii. particulars or production of documentary evidence, if any.
- 3.4.4 Notwithstanding the above, the Whistleblower shall be guided by the form as set out in **Appendix 1 - Form A** for reporting purposes.
- 3.4.5 The personal details and confidential information provided by the Whistleblower will be kept confidential. The Whistleblower may be asked to provide further clarification and information from time to time, during the course of investigation.
- 3.4.6 Although the Company is not expected to address any anonymous allegations, however, the Company may, consider investigating an anonymous allegation after having considered the following:
- i. the seriousness of the concern;
 - ii. the credibility and merit of the report; and
 - iii. the likelihood of confirming the report from credible sources.
- 3.4.7 A Whistleblower who elects to remain anonymous is advised that no protection from Detrimental Action within the Company or Group will be accorded and the investigation of the reported disclosure is limited to the extent of the contents of the report received.

 BURSA MALAYSIA <small>Creating Opportunities, Growing Value</small>	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

4.0 PROTECTION

4.1 Upon making a report of Improper Conduct in **Good Faith**, in accordance with the Policy:-

- (a) the Whistleblower's identity and confidential information shall be protected and kept confidential as provided in **Section 5.0** unless otherwise required by law or for the purpose of any proceedings by or against the Company or Group;
- (b) the Whistleblower shall be protected from **Detrimental Action** within the Company or Group as a direct consequence of the Whistleblower's report. If the Whistleblower reasonably believes he/she is being subjected to Detrimental Action from any person within the Company or Group or from external parties as a direct consequence of having made a disclosure under this Policy, he/she may consult the IGU in confidence (**Appendix 1 - Form B - Complaint of Detrimental Action**);

4.1.1 Any report of Improper Conduct made in good faith, even if it is not subsequently confirmed by an investigation shall be eligible for protection under this Policy.

4.1.2 Any person who has not acted in **Good Faith** shall not be entitled to any protection under this Policy.


4.2 Requirement for Good Faith

4.2.1 Since an allegation of Improper Conduct may result in serious personal repercussions for the person who has allegedly committed an Improper Conduct, any person who intends to lodge any report of Improper Conduct shall ensure that the report of Improper Conduct is made in good faith.

4.2.2 Any person making an allegation of Improper Conduct must have reasonable and probable grounds before reporting such Improper Conduct and must undertake such reporting in good faith, for the best interest of the Company and not for personal gain or motivation.

4.2.3 The element of good faith shall be deemed to be lacking when:

- (a) the person does not have personal knowledge or a factual basis for the report of Improper Conduct; or
- (b) where the person knew or reasonably should have known that the report or any of its contents are false; or
- (c) where the report is frivolous or vexatious; or

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

(d) there are any other circumstances that indicate that the report has been made with malicious intent, ulterior motive or for personal gain.

4.2.4 In addition, any person who makes allegations or reports that are proven to have been made without good faith may be subjected to disciplinary action (which may include termination of employment or contract) or any other action deemed fit, (where applicable).

4.2.5 In the case of Detrimental Action as provided in 4.1 (b) above, any Detrimental Action carried out against the Whistleblower by any Employee constitutes a serious breach of this Policy and may result in disciplinary action against such Employee, including issuance of formal warning or reprimand, suspension or termination of employment or service with the Group.

4.3 Revocation of Protection


4.3.1 The Company reserves the right to revoke the Whistleblower protection accorded under this Policy if the Whistleblower has, or is found to have:

- (a) made a report of an Improper Conduct not in good faith
- (b) participated in the reported Improper Conduct;
- (c) made a disclosure not in accordance with the requirements of this Policy, including any disclosures that are deliberately false, dishonest, mischievous, malicious, frivolous or vexatious; or
- (d) made solely or substantially to avoid dismissal or any other disciplinary action;

4.3.2 Accordingly, a written notice will be provided to the Whistleblower of the revocation of protection. Appropriate action will be taken against those who make malicious, vexatious or frivolous allegations.

4.3.3 Any Employee who has participated in an Improper Conduct may be subjected to disciplinary action. However, in certain circumstances, the RMC may, at its discretion, on a case-by-case basis decide to grant amnesty or consider leniency for the Employee.

4.3.4 However, please note that the Company has no power to provide any immunity from criminal prosecution. The Company also does not have any power to grant any protection from Detrimental Action to a Whistleblower who is not an Employee.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

5.0 CONFIDENTIALITY

5.1 Reasonable steps will be taken to maintain the confidential information, confidentiality of the Whistleblower and report made by the Whistleblower, unless:-

- (a) the Whistleblower expressly agrees to otherwise, and provides his/her agreement in writing; or
- (b) otherwise required by law.

However, there may be circumstances during investigation where it is necessary to disclose the identity of the Whistleblower. If such circumstances exist, the CIGO/IGU or the Independent Party involved in investigations shall endeavour to inform the Whistleblower that his/her identity is likely to be disclosed and to obtain his/her consent for the said disclosure .

5.2 The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties any information regarding the improper conduct or any part thereof, including the status or outcome of an investigation into it, except:-

- (a) to those who are authorised under this Policy;
- (b) by lodging a report with an enforcement agency in accordance with the Whistleblower Protection Act 2010 or any other prevailing law;
- (c) if required by law; and
- (d) on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

5.3 The Whistleblower shall not:-

- (a) contact the suspected individual in relation to the alleged Improper Conduct to determine facts or demand restitution; and
- (b) discuss the case, facts, suspicions, or allegations with anyone except to assist in the investigations.

5.4 Any person who obtains any Confidential Information in the course of any investigation of an allegation of Improper Conduct shall not disclose any part of the Confidential Information or any part thereof.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance


6.0 INVESTIGATION PROCEDURES FOR EMPLOYEES

6.1 Log of Reports of Improper Conduct

- 6.1.1 All reports of Improper Conduct, findings of investigations, corrective actions and monitoring shall be centralised and logged in a log or register administered and monitored by the IGU. The CIGO may assign a designated IGO to manage the log. The RMC shall be informed of any new reports of Improper Conduct and may request to review the log at any time.
- 6.1.2 The Chairman of RMC shall be kept informed of any new reports of Improper Conduct reported where the Chairman of RMC is not implicated (to the extent possible, without disclosure of identity of the Whistleblower and the person who allegedly committed that Improper Conduct) so that any interim corrective measure (if applicable) regarding any Improper Conduct can be taken immediately.
- 6.1.3 After receiving a report of Improper Conduct, the CIGO or the designated IGO shall log the whistleblower case in the register.
- 6.1.4 In a case where the CIGO or the IGO is implicated, the Chairman of RMC may refer the matter to IA to assess and investigate the matter in accordance to Appendix 2. The RMC shall review the investigation report and determine whether the allegation could be substantiated or not. In the event the allegation could be substantiated, the RMC will identify and recommend the corrective action to be taken to mitigate the risks of such Improper Conduct recurring and recommend whether disciplinary action is to be taken against the wrongdoer.


6.2 Investigation Procedures

- 6.2.1 Upon logging a report of Improper Conduct, the recipient or IGU will provide the Whistleblower with an acknowledgement of receipt of the report of the Improper Conduct within two (2) working days of receipt.
- 6.2.2 Subsequently, if necessary, the following person/s may be consulted (to the extent possible, without disclosure of identity of the Whistleblower and the person who allegedly committed the Improper Conduct) to assist and to provide relevant advice in relation to their respective areas:
- (i) a breach of any law - Head, Corporate Legal; or
 - (ii) a breach of the Code of Ethics - Director of Human Resources; or
 - (iii) any other party who has the expertise in the matter of concern relating to the whistleblowing.
- 6.2.3 When deliberating whistleblowing report, the RMC Chairman will be consulted by the RMC, CIGO, IGO and other division representatives, as required.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

6.3 Preliminary Investigation

- 6.3.1 The CIGO or IGO will conduct a preliminary investigation of every report of Improper Conduct received to determine whether there are merits to initiate a full investigation.
- 6.3.2 The findings of the preliminary investigation and recommendation shall be referred to the Chairman of the RMC for a decision on whether to close the case or to proceed to a full investigation of the allegations. The Chairman of the RMC may decide to consult with the members of the RMC or convene an RMC meeting before making a decision.
- 6.3.3 Upon review of the findings of the preliminary investigation, the Chairman of the RMC may, where appropriate:
- (a) instruct the matter to be closed in the event the preliminary findings clearly indicate that there are no circumstances that warrant a full investigation; or
 - (b) instruct the CIGO to commence a full investigation in the event the preliminary findings clearly indicate suspicious circumstance. The Chairman of the RMC may delegate the oversight of the investigation and review of results of the investigation to the CEO; or
 - (c) refer the matter to the full RMC to determine the next course of action in case where the CEO or the CIGO is involved. In such cases where the report involves the CIGO or the CIO, the RMC may appoint Director of IA or select other personnel (having due regard to suitable seniority and any circumstances that may give rise to conflicts of interest) or an Independent Party to investigate the allegations; or
 - (d) may decide whether the matter should be referred to the relevant authorities, such as the Polis Diraja Malaysia (PDRM) or the Malaysian Anti-Corruption Commission (“MACC”) for further action, in cases where the preliminary findings disclose a possible criminal offence, upon the consultation with the RMC and/or legal advisors (internal and/or external); or
 - (e) determine any other course of action that the Chairman of the RMC deems fit having regard to the circumstances of the matter reported and the fairness of the conduct of any investigation.
- 6.3.4 If the matter is to be closed, the CIGO or IGO will inform the Whistleblower that the matter is closed.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

6.3.5 If the matter is to be referred to the relevant authorities, subject to any legal requirements or prohibitions, the CIGO or IGO will inform the Whistleblower that the matter has been referred to the authorities concerned. The Whistleblower may be required to lodge a report to the relevant enforcement agencies together with the IGU officer.

6.3.6 In the event a full investigation is to be carried out, the CIGO or IGO will inform the Whistleblower of the conduct of a full investigation and the Whistleblower shall give his/her full cooperation during the conduct of the investigation.

6.4 Full Investigation

6.4.1 In the event a full investigation is to be conducted, the CIGO and/or IGO and/or any other persons identified and approved by the RMC shall conduct the investigation and endeavour to complete such investigation within **two (2) months**. Any extension of the time required for the completion of the investigation shall be subject to the RMC's approval.


6.4.2 The Whistleblower shall give his/her full cooperation to any investigation conducted.

6.4.3 In the event a full investigation is to be conducted on a report of Improper Conduct by the CEO, CIGO or IGO, and the RMC decides to appoint an external Independent Party to conduct or to assist in conducting the investigation, the terms of appointment of the said external Independent Party shall be approved by the RMC.

6.4.4 All information, documents, records and reports relating to the investigation of an Improper Conduct shall be kept securely to ensure its confidentiality.

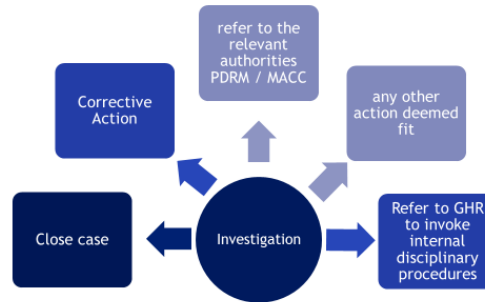
6.5 Findings of Investigation

6.5.1 Upon the conclusion of a full investigation, the investigation report shall be reviewed by the RMC. Upon the review of such investigation report, the RMC shall determine whether or not the allegation could be substantiated. In the event the allegation is substantiated, the RMC will identify and recommend the corrective action(s) to be taken to mitigate the risks of such Improper Conduct recurring and/or may recommend to refer the matter to GHR for further disciplinary action is to be taken against the wrongdoer, where appropriate.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

THE POSSIBLE OUTCOME POST INVESTIGATION

After the full investigation has been completed, the Chairman of the RMC may decide on the following:



6.6 Decision


- 6.6.1 In a case where the Chairman of the RMC has reviewed the investigation and made a determination that the allegation can be substantiated, a final report together with the recommendation of the CEO will be tabled to the RMC. The RMC will review the final report and decide on the corrective action to be taken and/or the disciplinary action to be taken (if any).
- 6.6.2 Following Chapter 6.6.1, the RMC may refer the final report together with the recommendations to the Board of Directors. The Board of Directors will review the final report and confirm on the corrective action to be taken and/or the disciplinary action to be taken (if any)
- 6.6.3 Subject to any prohibition in law or any legal requirements, the CIGO or IGO will inform the Whistleblower that the investigation has been completed and the findings have been presented to the RMC or the Board of Directors as the case may be. As the findings are confidential, the details of the findings will not be disclosed to the Whistleblower.

6.7 Corrective Action

- 6.7.1 The IGU shall carry out the decisions of the RMC in relation to the findings of the investigation on the allegation of an Improper Conduct against an Employee.
- 6.7.2 Where applicable, the Management shall institute the appropriate controls to prevent any further wrongdoings or damage to the Company.

6.8 Disciplinary Action

- 6.8.1 In the event any disciplinary action is being taken against an Employee, the GHR shall carry out the disciplinary procedures in accordance with the Group Disciplinary Policy.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

7.0 INVESTIGATION PROCEDURES FOR THE CHAIRMAN, BOARD OF DIRECTORS, CEO OR INDEPENDENT INDIVIDUALS

7.1 Reports of Director's or Independent Individual's Improper Conduct

7.1.1 After receiving a report of Chairman of the Board, Board of Director, CEO or any Independent Individual's Improper Conduct, the Chairman of the Board (SID or the Chairman of RMC, where applicable) shall form an opinion on whether he/she believes the case is a frivolous claim or is a case where there are suspicious circumstances.

7.1.2 If necessary, the Chairman of the Board (SID or the Chairman of RMC, where applicable) may seek independent legal advice or any other professional advice regarding the report made.

7.2 Investigation Procedures

7.2.1 The Chairman of the Board (SID or the Chairman of RMC, where applicable) shall in his discretion decide whether the case shall be closed or to proceed to a full investigation on the allegations or to refer the matter to the relevant authorities or determine any other course of action that he deems fit having regard to the circumstances of the matter reported and the fairness of the conduct of any investigation. IGU may be assigned as the secretariat of the whistleblowing report if necessary and appropriate.

7.2.2 In the event a full investigation is to be carried out, the Independent Party appointed to carry out investigations will inform the Whistleblower and the Whistleblower shall give his/her full cooperation during the conduct of the investigation.

7.2.3 The procedures of the investigation shall adopt the due processes to avoid any conflicts of interest and to ensure procedural fairness to the particular Director or Independent Individual involved.

7.2.4 All information, documents, records and reports relating to the investigation of a Director's or Independent Individual's Improper Conduct shall be kept securely to ensure its confidentiality.

7.3 Findings of Investigation and Decision

7.3.1 Upon the conclusion of an investigation, the Board shall review the investigation report and determine whether the allegation could be substantiated or not. Notwithstanding the above, any particular Director(s) being the subject matter of the investigation of Improper Conduct shall not participate in the deliberation thereof.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

7.4 Corrective Action

7.4.1 If there is any corrective action to be taken, the Board shall take the necessary action.

8.0 WHISTLEBLOWER PROTECTION ACT 2010 (“ACT”) AND LISTING REQUIREMENT

8.1 Whistleblower Protection Act 2010 - Application of The Act

8.1.1 In June 2010, the Whistleblower Protection Act 2010 (“the Act”) was passed by Parliament and came into force on 15th December 2010. The Act protects persons making disclosures of improper conduct in the public and private sector from civil and criminal action. In addition, the Act allows for proper investigation to be carried out by an enforcement agency set up by the Federal Government, State Government or local government (“Enforcement Agency”).


8.1.2 If a Whistleblower wishes to make a disclosure or report of improper conduct by any Employee pursuant to the Act, then he/she will have to make the said disclosure of improper conduct to an Enforcement Agency. Any investigations and/or actions taken thereafter would be in accordance with the Act and are independent of the procedures described in this Policy.

8.1.3 Whilst the Company respects the rights of the Whistleblower to directly make reports of improper conduct of an Employee to an Enforcement Agency, the Company advises and urges the Employees to report Improper Conduct of an Employee to the Company first so that the Company can address and remedy any wrongdoings and where applicable, institute the appropriate controls to prevent any serious damage to the Company.

8.2 Listing Requirement

8.2.1 On 5 April 2018, the Malaysian Parliament amended the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act”) to incorporate, among others, a new Section 17A on corporate liability for corruption. Effective 1st June 2020, a commercial organisation (including a listed corporation) may be found liable for acts of corruption committed by any persons associated with the organisation (such as its directors or employees).

8.2.2 Pursuant to the above amendment, the Exchange has amended the Listing Requirement to encapsulate anti-corruption measures which are in addition to the statutory provisions under the law.

	Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
	Version	3.0
	Date	28 April 2022
	Owner	IGU, Risk & Compliance

8.2.3 Below is the extract from the Listing Requirement, Appendix 1 : Amendments in Relation to Anti-Corruption Measures, Chapter 15: Corporate Governance, Part H - Anti Corruption and Whistle-Blowing.

- (1) A listed issuer and its board of directors must ensure that -
 - (a) the following are established and maintained for the listed issuer and its subsidiaries (“group”):
 - (i) policies and procedures on anti-corruption that are, at a minimum, guided by the Guidelines on Adequate Procedures issued pursuant to section 17A(5) of the Malaysian Anti-Corruption Commission Act 2009; and
 - (ii) policies and procedures on whistle-blowing;
 - (b) the policies and procedures in subparagraph (a) above are reviewed periodically to assess their effectiveness, and in any event, at least once every 3 years; and
 - (c) corruption risk is included in its annual risk assessment of the group.
- (2) A listed issuer must also publish on its website -
 - (a) its policy on anti-corruption; and
 - (b) its policy and procedures on whistle-blowing.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

9.0 CONCLUSION

Bursa Malaysia is committed to the highest standard of leadership, integrity, and ethics in the organization. The implementation of this policy seeks to enhance corporate governance and to foster an environment where integrity and ethical behavior is maintained and any Improper Conduct in the company may be exposed. The Policy may also act as an early warning system and may enable the company to remedy any improper conduct before serious damage is caused. Therefore, Whistleblowers are encouraged to come forward with information on any alleged Improper Conduct as there are safe avenues for them to make disclosures of such alleged Improper Conduct in good faith, by protecting their identities, and protecting them from any post Detrimental Action pursuant to this policy.

WHISTLEBLOWER POLICY AND PROCEDURES FOR BURSA MALAYSIA GROUP

APPENDIX 1 – FORM A

10.0 APPENDICES

APPENDIX 1 - REPORT OF IMPROPER CONDUCT

FORM FOR REPORT OF IMPROPER CONDUCT

CONFIDENTIAL

REFERENCE NUMBER: _____

A. PERSONAL PARTICULARS OF WHISTLEBLOWER							
1	Name:						
2	I/C No. / Passport No./Staff no.:						
3	Correspondence Address:						
4	<table style="width: 100%; border: none;"> <tr> <td style="width: 35%; border: none;">Telephone No.:</td> <td style="border: none;">Home:</td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;">Office:</td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;">Mobile:</td> </tr> </table>	Telephone No.:	Home:		Office:		Mobile:
Telephone No.:	Home:						
	Office:						
	Mobile:						
5	E-mail Address:						
6	Designation / Occupation:						
7	<table style="width: 100%; border: none;"> <tr> <td style="width: 45%; border: none;">Preferred method of communication:</td> <td style="border: none;"> <input type="checkbox"/> mail <input type="checkbox"/> e-mail <input type="checkbox"/> telephone /sms </td> </tr> </table>	Preferred method of communication:	<input type="checkbox"/> mail <input type="checkbox"/> e-mail <input type="checkbox"/> telephone /sms				
Preferred method of communication:	<input type="checkbox"/> mail <input type="checkbox"/> e-mail <input type="checkbox"/> telephone /sms						
B. INFORMATION OF PERSON BEING REPORTED WHO INVOLVED IN IMPROPER CONDUCT							
Individual 1							
1	Name of person being reported:						
	Designation / position of person being reported :						
	How do you know the person being reported?						

WHISTLEBLOWER POLICY AND PROCEDURES FOR BURSA MALAYSIA GROUP

APPENDIX 1 – FORM A

Individual 2			
2	Name of person being reported:		
	Designation / position of person being reported :		
	How do you know the person being reported?		
Individual 3			
3	Name of person being reported:		
	Designation / position of person being reported :		
	How do you know the person being reported?		
C. DETAILS OF IMPROPER CONDUCT			
	Date:		
	Time:		
	Place:		
Details of Improper Conduct: *Please submit supporting documents if available. *Please attach additional sheets if necessary			
(cross X where applicable)			
Have you lodged a complaint on this matter to another person / department / authority before?			
<table border="1" style="display: inline-table; border-collapse: collapse;"> <tr> <td style="width: 50px; text-align: center;">YES:</td> <td style="width: 50px; text-align: center;">NO:</td> </tr> </table>		YES:	NO:
YES:	NO:		
If YES, please indicate the person / department / authority that the report was lodged: (cross X where applicable)			

WHISTLEBLOWER POLICY AND PROCEDURES FOR BURSA MALAYSIA GROUP

APPENDIX 1 – FORM A

	(i) Police		*Please attach a copy of the report made.
	(ii) Malaysian Anti-Corruption Commission		*Please attach a copy of the report made.
	(iii) Securities Commission		*Please attach a copy of the report made.
	(iv) Ministry of Finance		*Please attach a copy of the report made.
	(v) Others (please indicate the organization)		Name of organization: _____ – *Please attach a copy of the report made.
Date report was made:			
Status of report made:			
D. DECLARATION			
1	I declare that that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.		
2	I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.		
Signature:			
Name:			
Date:			

WHISTLEBLOWER POLICY AND PROCEDURES FOR BURSA MALAYSIA GROUP

APPENDIX 1 – FORM A

For Office Use Only:

Record No.:

Officer receiving this report:

Date:

WHISTLEBLOWER POLICY AND PROCEDURES FOR BURSA MALAYSIA GROUP

APPENDIX 1 - FORM B

Appendix 1 : Complaint Of Detrimental Action Form

REFERENCE NO: _____

1	Name:	
2	I/C No. / Passport No.	
3	Correspondence Address:	
4	Telephone No.	Home:
		Office:
		Handphone:
5	Designation /Occupation:	
6	Preferred method of communication:	<input type="checkbox"/> Mail <input type="checkbox"/> Email <input type="checkbox"/> Telephone/SMS
7	Information and particulars of Detrimental Action:	
	(i) Name(s) of Person(s) committing the Detrimental Action:	
	(ii) Detrimental Action complained of:	
	<p>*Please submit supporting documents if available.</p> <p>*Please attach additional sheets if necessary</p>	

WHISTLEBLOWER POLICY AND PROCEDURES FOR BURSA MALAYSIA GROUP**APPENDIX 1 - FORM B**

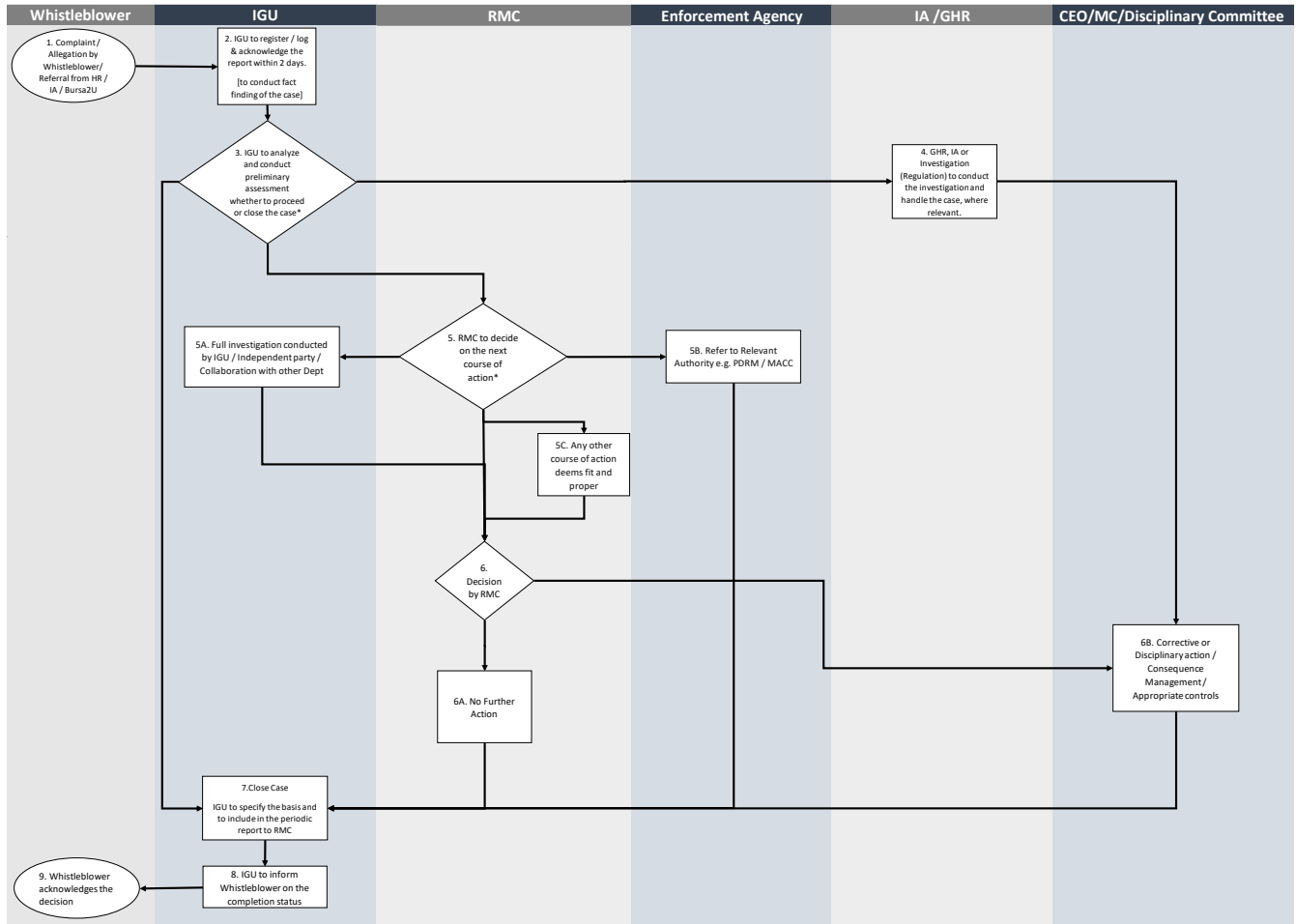
DECLARATION	
1	I declare that that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.
2	I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to another department / authority / enforcement agency for purposes of investigation.
Signature :	
Name:	
Date:	
For Office Use Only:	
Record No.:	
Officer receiving this report:	
Date:	



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

APPENDIX 2 - WHISTLEBLOWING PROCEDURES FOR BURSA MALAYSIA GROUP (PROCESS FLOW AND PROCEDURES)

Whistleblowing Process Flow and Procedures (Employee)





Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Whistleblowing Procedures (Employee)

No	Stage	Description	Role / Task	Remark
1.	Complaint Allegation by: i. Whistleblower (internal / external) ii. Referral from HR / IA / Bursa2U	Sources of the report can be from supervisors, GHR, IA, employees, Bursa@2U and public.	IGU to determine whether it is reportable, non-reportable to MACC / other authorities.	Only Chairman of RMC, CIGO and IGO have the access to the whistleblowing email relating to employees. IGU will also scan through the emails in Bursa2U and other emails.
2.	To register / log & acknowledge the report within 2 days.	Registration can be done effectively if the whistleblower willing to share his/her contact details. IGU may not proceed with further steps if the whistleblower refuse to share his/her contact details, to put the complaint in writing AND consider the whistleblowing report has no basis .	IGU is expected to: i. To create a log and register the report. ii. To get the detail of the whistleblower such as name, email address and contact number. iii. To acknowledge the report in writing within 2 days. iv. To conduct fact finding of the case.	Criteria of No Basis: 1. There are no details and contact of the whistleblower (name & contact no). 2. The subject matter is not relevant or not related to Bursa. 3. The subject matter is unfounded and considered as fictitious, frivolous, and vexatious.
3.	IGU to analyze and conduct preliminary assessment whether to proceed or close the case in consultation with the Chairman of RMC	Assessment to be conducted based on the information and evidence that is available and obtained at this juncture to determine whether there is a cause of action to be taken.	In consultation with the Chairman of RMC, CIGO will decide to proceed or not to proceed based on the preliminary assessment. IGU to prepare a report/memo to RMC on the finding of the preliminary assessment. CIGO to inform Chairman	IGU may seek Independent Legal Advice from GCL / IA / GHR / External Lawyer/independent party, if required. IGU to KIV the case in case of insufficient evidence to proceed.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

			<p>of RMC on proposed next course of action.</p> <p>IGO is expected to:</p> <ul style="list-style-type: none"> i. interview the whistleblower. ii. interview the parties/witnesses/ informer. iii. Interview the alleged staff/witnesses. iv. to record in writing / audio / video. (consent must be obtained) 	<p>IGU to close the if the evidence is not available.</p> <p>To advise GHR if suspension of suspected employee is necessary.</p>
4	<p>IGU, GHR, IA or Investigation (Regulation) to conduct the investigation and handle the case, where relevant.</p>	<p>Criteria for selection of investigator:</p> <p>IGU: Preliminary Investigation and /or cases that assigned by RMC for IGU to investigate.</p> <p>GHR: Any report that administrative in nature i.e. Breach of Company's policies such as Group Disciplinary Policy & Code of Ethics</p> <p>IA: Any report that IA's involvement is required as 3rd line of defence.</p> <p>Investigation (Regulation): Any report regarding PLC / Market Participants which fall within the purview of Regulation.</p>	<p>The investigation must be conducted diligently and independently without any influence or involvement by unrelated parties.</p> <p>The finding must be submitted to RMC via an official memo for attention, further directive or decision.</p>	<p>IGU shall have the sufficient authority to give instruction to the division or department who involved in the investigation.</p> <p>At this stage, the investigator may advise GHR if suspension of suspected employee is necessary.</p>



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

5.	RMC to decide on the next course of action.	RMC Chairman will be informed first. Subsequently, RMC will deliberate based on the circumstance, facts, evidence, finding presented by IGU and decide on the next course of action.	<p>Escalation to RMC in writing via email/memo with the preliminary report finding and submit to RMC Chairman first. The discussion must be handled with strict confidence. Subsequently, the full meeting of RMC on whistleblowing report will be conducted which involve IGU and RMC members only.</p> <p>IGU to take note and record the decision.</p>	<p>RMC may in consultation with other Board committees /CGS/ independent party, where relevant.</p> <p>To use email as official communication. The meeting is only for limited attendees i.e. IGO, selected personnel from CGS (as secretary) and RMC members only.</p> <p>Any unrelated officer may step out during the discussion as directed by RMC.</p>
5A	Full investigation conducted by IGU / Independent party / collaboration with other Department	Once there is a sufficient believe that the cause of action has been established, full investigation to be conducted to determine, fully and credibly, what happened with respect to a particular incident - whether suspected conduct did or did not take place; what the circumstances were; who was involved; whether a violation of law or policy occurred.	The finding of the investigation must be escalated to RMC via a memo for a decision. Mandate to be given upfront by RMC where the investigator shall have access to the other Divisions and their documentations.	The detailed procedure on how investigation to be conducted is provided in chapter 6 of this document.
5B	Refer to Relevant Authority e.g. PDRM / MACC etc.	In the event there is a believe that the case involves corruption, fraud, abuse of power and / or criminal, the case must be reported to the relevant authority.	All report to MACC must use the format provided by MACC via the most convenient and suitable channel provided. IGO must be present together with the whistleblower when lodging the report in	GHR may invoke disciplinary action depending on cases to case basis.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

			order to get the protection under Whistleblower Act. IGU to provide the preliminary report to IGU for further action.	
5C	Any other course of action deems fit and proper	RMC may give other directives or action to be taken to resolve the matter internally. RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.	IGU to record the decision inform the relevant parties accordingly.	
6.	Decision by RMC	RMC may give other directives to resolve the matter internally. RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.	IGU to record the decision inform the relevant parties accordingly.	
6A.	No Further Action	RMC may decide No Further Action if there is no basis to proceed further. RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.	IGU to record the decision inform the relevant parties accordingly.	
6B.	Corrective or Disciplinary action / Consequence Management / Appropriate controls	GHR / CEO/ Group Disciplinary Committee may decide on the action to be taken against the staff based on the CAM and Group Disciplinary Policy.	IGU to record the decision inform the relevant parties accordingly.	



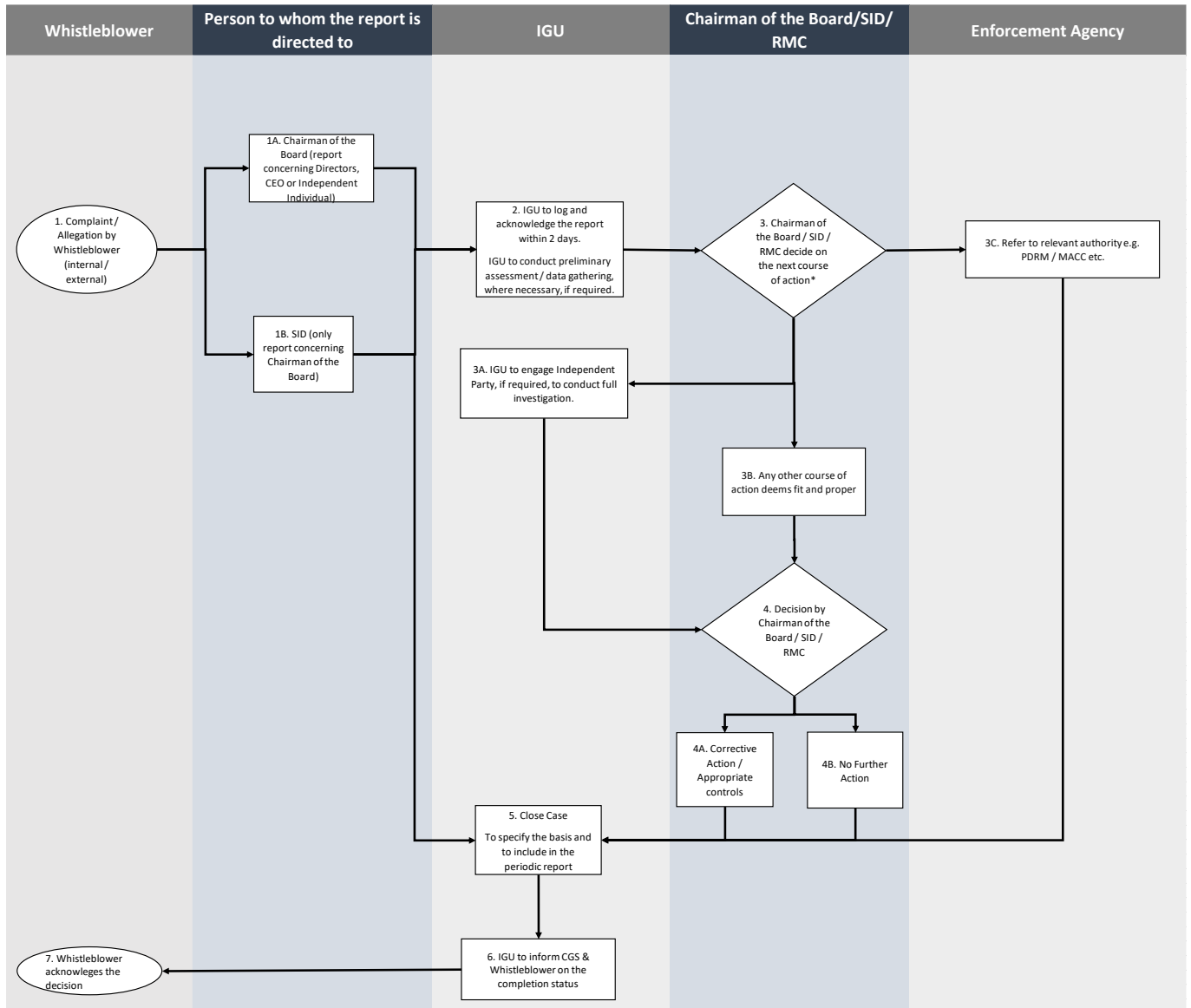
Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

7.	Close Case	The case has been resolved, decided or disposed accordingly	IGU to specify the basis and to include in the periodic report to RMC.	
8.	IGU to inform Whistleblower on the completion status	Upon completion of the case, the whistleblower will be informed on the outcome accordingly.	The decision must be informed in writing.	
9.	Whistleblower acknowledges the decision	The acknowledgment must be in writing either via email or letter.	IGU must keep the acknowledgement for record purpose.	



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Whistleblowing Process Flow and Procedures (Chairman, Board of Directors, CEO or Independent Individuals)





Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Whistleblowing Procedures (Chairman, Board of Directors, CEO, or Independent Individual)

No	Stage	Description	Role / Task	Remark
1.	Complaint / Allegation by whistleblower (internal / external)	Sources of the report can be from employees, Bursa@2U and public.	Chairman of the Board / SID / Chairman of RMC to determine and provide advice whether it is reportable, non- reportable to MACC / other authorities.	
1A.	Whistleblowing to Chairman of Board / SID about wrongdoing of the Board of Directors CEO or Independent Individual.	The whistleblowing can be sent directly to the Chairman / SID if the issue involves Board of Directors, CEO or Independent Individual	Any report will be informed to IGU for record depending on its suitability. IGU shall acknowledge the report and to assist the Chairman in conducting preliminary assessment / data gathering.	
1B	Whistleblowing to SID about wrongdoing of the Chairman the Board.	The whistleblowing can be sent directly to SID if the issue involves Chairman of the Board.	Chairman of RMC may inform IGU to record, acknowledge the report and to assist in conducting preliminary assessment / data gathering.	
2	<p>If requested by the Chairman of the Board / SID / Chairman of RMC, IGU to log and acknowledge the report within 2 days.</p> <p>IGU to conduct preliminary assessment / data gathering, where necessary, if required.</p>	<p>IGU will handle administrative process of the complaint discreetly with high integrity.</p> <p>Registration can be done effectively if the whistleblower willing to share his/her contact details.</p> <p>Chairman, SID or Chairman of RMC may not proceed with further steps if the whistle blower refused to share contact details, to put the complaint in writing AND the whistleblowing has no basis.</p>	<p>IGU is expected to:</p> <ul style="list-style-type: none"> i. To create a log and register the report. ii. To get the details of the whistleblower such as name, email address and contact number. iii. To acknowledge the report in writing within 2 days. iv. To conduct fact finding of the case. <p>IGU may seek independent Legal Advice from relevant stakeholders, if required by the Chairman or TMV.</p> <p>IGU to provide preliminary assessment and report to RMC, if required.</p>	<p>Criteria of No Basis:</p> <ul style="list-style-type: none"> i. There are no details and contact of the whistleblower (name & contact no). ii. The subject matter is not relevant or not related to Bursa. iii. The subject matter is unfounded and considered as fictitious,



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

				frivolous, and vexatious.
3	Chairman of the Board / SID / Chairman of RMC to decide on the next course of action*	Chairman of the Board / SID / Chairman of RMC may use its power and discretion to proceed the next course of action on cases to case basis depending on the facts and circumstances of the case.	IGU to take note and record the decision.	
3A	IGU to engage Independent Party, if required, to conduct full investigation.	<p>IGU to engage independent party once there is a sufficient believe that the cause of action has been established, full investigation to be conducted to determine, fully and credibly, what happened with respect to a particular incident - whether suspected conduct did or did not take place; what the circumstances were; who was involved; whether a violation of law or policy occurred.</p> <p>Chairman of the Board / SID/ Chairman of RMC may direct IGU / Independent party to conduct investigation and fact finding.</p>	Mandate to be given upfront by RMC where the investigator shall have access to the other relevant witnesses and their documentations.	<p>Procedure how investigation to be conducted. Guiding principles is provided in Chapter 7 of this document.</p> <p>The Board may appoint 3rd independent party/consultant to review and investigate the whistleblowing report.</p>
3B	Any other course of action deems fit and proper	Chairman of the Board / SID / Chairman of RMC may use its power and discretion to proceed the next course of action on cases to case basis depending on the facts and circumstances of the case.	IGU to take note and record the decision.	
3C	Refer to relevant authority e.g. PDRM / MACC etc.	In the event there is a believe that the case involves corruption, fraud, abuse of power and / or criminal, the case must be	All report to MACC must use the format provided by MACC via the most convenient and suitable channel provided.	



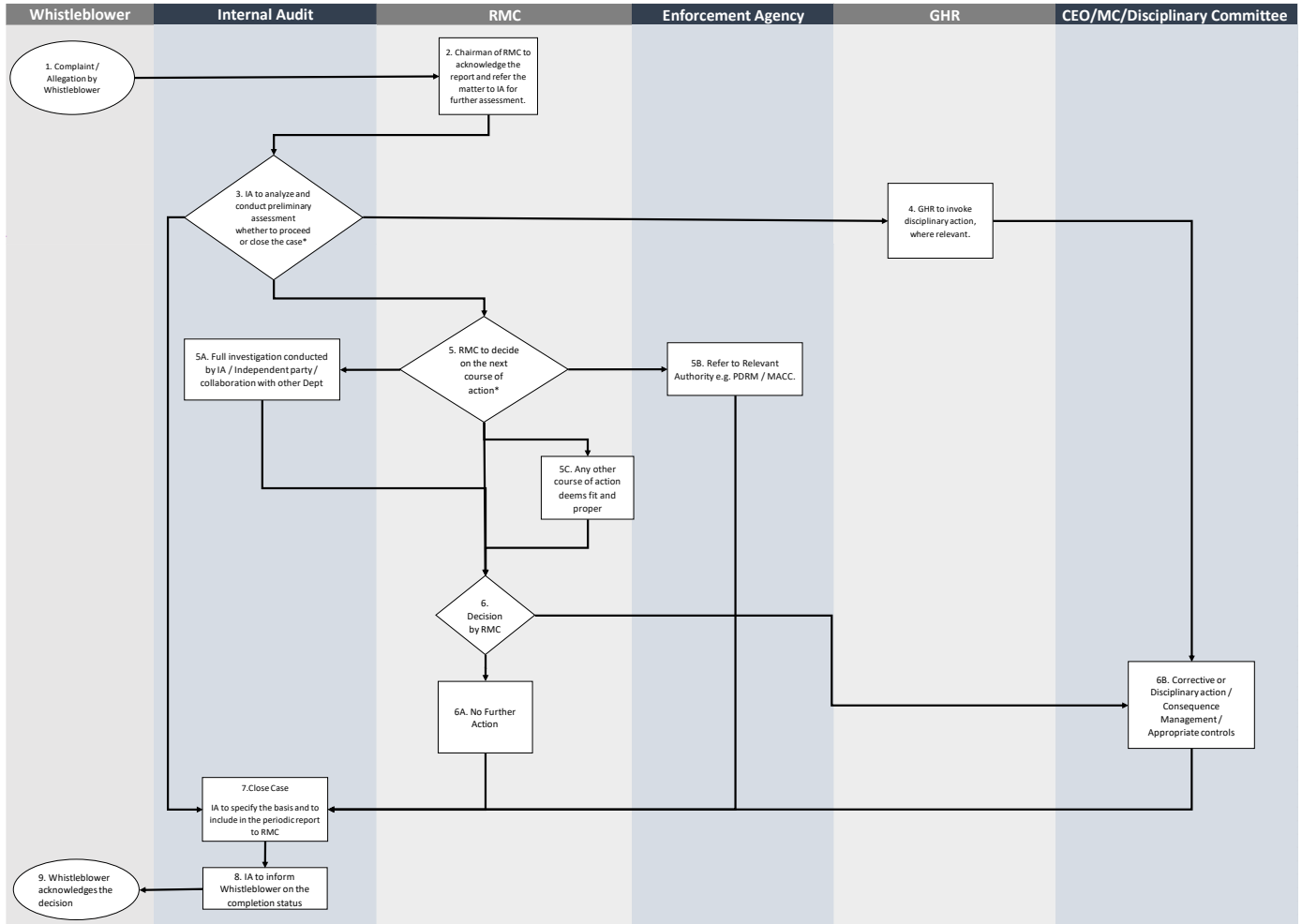
Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

		reported to the relevant authority.	IGU officer must be present together with the whistleblower when lodging the report in order to get the protection under Whistleblower Act.	
4	Decision by Chairman of the Board / SID / Chairman of RMC	Chairman of the Board / SID / Chairman of RMC may give other directives to resolve the matter internally. Chairman of the Board / SID / Chairman of RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.	IGU to record the decision inform the relevant parties accordingly.	
4A	Corrective Action / Appropriate controls	Chairman of the Board / SID / Chairman of RMC may decide on the action to be taken against the Director, CEO or Independent Individual	IGU to record the decision inform the relevant parties accordingly.	
4B	No Further Action	Chairman of the Board / SID / Chairman of RMC may decide No Further Action if there is no basis to proceed further. Chairman of the Board / SID / Chairman of RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.	IGU to record the decision inform the relevant parties accordingly.	
5	Close Case	The case has been resolved or disposed accordingly	IGU to specify the basis and to include in the periodic report to RMC.	
6	IGU to inform CGS & Whistleblower on the completion status	Upon completion of the case, the Whistleblower will be informed on the outcome accordingly.	The decision must be informed in writing.	
7	Whistleblower acknowledges the decision	The acknowledgment must be in writing either via email or letter.	IGU must keep the acknowledgement for record purpose.	



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Whistleblowing Process Flow (CIGO or IGO)





Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

Whistleblowing Procedures (CIGO or IGO)

No	Stage	Description	Role / Task	Remark
1.	Complaint Allegation / Whistleblower by against CIGO or IGO	Sources of the report can be from supervisors, GHR, IA, employees, Bursa@2U and public.	RMC Chairman To determine whether it is reportable, non-reportable to MACC / other authorities	
2.	Chairman of RMC to acknowledge the report and refer the matter to IA for further assessment	IA may not proceed with further steps if the whistle blower refused to share contact details, to put the complaint in writing and the complaint/report has no basis.	IA i. To register the report. ii. To get the detail of the whistleblower such as name, email address and contact number. iii. To acknowledge the report in writing within 2 days iv. To conduct fact finding of the case.	Criteria of No Basis: 1. There are no details and contact of the whistleblower (name & contact no). 2. The subject matter is not relevant or not related to Bursa. 3. The subject matter is unfounded and considered as fictitious, frivolous, and vexatious.
3.	IA to analyze and conduct preliminary assessment whether to proceed or close the case.	Assessment to be conducted based on the information and evidence that is available and obtained at this juncture to determine whether there is a cause of action to be taken.	Director of IA will decide to proceed or not to proceed based on the assessment. IA is expected to: i. interview the whistleblower. ii. interview the parties /witnesses / informer. iii. Interview the alleged staff iv. to record in writing / audio / video. (consent must be obtained) IA to prepare a report/memo to RMC on the finding of the preliminary assessment	IGU may seek Independent Legal Advice from GCL / IA / GHR / External Lawyer, if required. IA to KIV the case in case of insufficient evidence to proceed. To close the case if the evidence is unavailable or insufficient. To advise GHR if suspension of suspected employee is necessary.



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

			and propose next course of action.	
4	GHR to invoke disciplinary action, where relevant.	Administrative / non-compliance to policies, Group Disciplinary Policy & Code of Ethics.	<p>The investigation must be conducted diligently and independently without any influence or involvement by unrelated parties.</p> <p>The finding must be submitted to RMC via an official memo for attention, further directive or decision.</p>	The investigator may advise GHR if suspension of suspected employee is necessary.
5.	RMC to decide on the next course of action.		escalation to RMC in writing via email/memo and should not use personal communication / whatsapp etc.	RMC may in consultation with other Board committees / CGS/ independent party, where relevant
5A	Full investigation conducted by IA / Independent party / collaboration with other Dept	<p>RMC Chairman will be informed first. Subsequently, RMC will deliberate based on the circumstance, facts, evidence, finding presented by IGU and decide on the next course of action.</p> <p>The meeting conducted is only for limited attendees i.e. IA officer and RMC members only.</p>	<p>Escalation to RMC in writing via email/memo with the preliminary report finding and submit to RMC Chairman first. The discussion must be handled with strict confidence. Subsequently, the full meeting of RMC on whistleblowing report will be conducted which involve IA officer and RMC members only.</p> <p>IA to take note and record the decision.</p>	<p>RMC may in consultation with other Board committees / GCS / independent party, where relevant.</p> <p>To use email as official communication.</p>
5B	Refer to Relevant Authority e.g. PDRM / MACC etc.	In the event there is a believe that the case involves corruption, fraud, abuse of power and / or criminal, the case must be reported to the relevant authority.	All report to MACC must use the format provided by MACC via the most convenient and suitable channel provided. IA officer must be present together with the whistleblower when lodging the report in order	



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

			to get the protection under Whistleblower Act.	
5C	Any other course of action deemed fit and proper by RMC	<p>RMC may give other directives or action to be taken to resolve the matter internally.</p> <p>RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.</p>	IGU to record the decision inform the relevant parties accordingly.	
6.	Decision by RMC	<p>RMC may give other directives to resolve the matter internally.</p> <p>RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.</p>	IA to record the decision inform the relevant parties accordingly.	
6A.	No Further Action	<p>RMC may decide No Further Action if there is no basis to proceed further.</p> <p>RMC may use its power and discretion to decide on cases to case basis depending on the facts and circumstances of the case.</p>	IA to record the decision inform the relevant parties accordingly.	
6B.	Corrective or Disciplinary action / Consequence Management / Appropriate controls	GHR / CEO/ Group Disciplinary Committee may decide on the action to be taken against the staff based on the CAM and Group Disciplinary Policy.	IA to record the decision inform the relevant parties accordingly.	
7.	Close Case	The case has been resolved, decided or disposed accordingly	IA to specify the basis and to include in the periodic report to RMC.	
8.	IA to inform Whistleblower on	Upon completion of the case, whistleblower will	The decision must be informed in writing.	



Title	Whistleblower Policy and Procedures for Bursa Malaysia Group
Version	3.0
Date	28 April 2022
Owner	IGU, Risk & Compliance

	the completion status of the case.	be informed on the outcome accordingly.		
9.	Whistleblower acknowledges the decision	The acknowledgment must be in writing either via email or letter.	IA must keep the acknowledgement for record purpose.	