



FOREVER SABAH BERHAD

(Co No. 1172311-D / 201601001385)

POLICIES AND GUIDELINES ON WHISTLE BLOWER

This Whistleblower Policy is intended to encourage and enable FS employees and volunteers to raise serious concerns within FS prior to seeking resolution outside the organisation. FS Board of Director (X-Team), officers, and employees need to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. This is because FS believes that our organisation is **synonymous** with our values. Therefore, when necessary, it is better to jeopardise parts, or even whole, of the current works of FS, **rather than** to allow the organisation as a whole to be tainted by such appalling and criminal acts, thereby destroying FS once and for all. We also strongly believe that our donors, funders and partners expect no less from us.

a. Reporting Responsibility

It is the responsibility of all Directors, officers, employees and volunteers to comply with FS policies and all applicable laws and regulations, and report violations or suspected violations in accordance with this Whistleblower Policy.

b. Complaint Procedure for Suspected Violations

Any member of FS, from an employee or volunteer to the senior management and Board of Directors, who has witnessed or has information about any violation of any of the FS policies by any of the persons associated with or subject to the control of FS (including employee, volunteer, senior management and Board of Directors, as well as consultant, technical coordinator, partners and other associates), should report such conduct to the Chief Executive Facilitator.

If the person is not comfortable approaching the Chief Executive Facilitator, or if the Chief Executive Facilitator is the subject of or implicated in the complaint, the person should raise the matter with the Human Resources officers. However, if both the Chief Executive Facilitator or the Human Resources officers are implicated in the complaint, the employee or volunteer should raise the matter with any other member of the senior management or the Board of Directors. Note that anonymous complaints will be investigated, but it may be difficult to do so fully.

Allegations of violation will be treated seriously and due regard to the need for confidentiality will be given. FS aims to resolve any complaint as quickly as possible. Under no circumstances shall

the person making the complaint be required to file a complaint with the person accused or implicated in the complaint.

c. No Retaliation

The right and duty to raise any violation at any time by way of complaint or as witness in an investigation should be exercised without fear of reprisal. FS **prohibits** any form of retaliation against any person making the complaint or becoming a witness, even if the allegation turns out to be unproven (except if the complaint or testimony was deliberately and knowingly false, fabricated or in bad faith). (Note: “Unproven” simply means that the evidence is insufficient, and is not the same as false, fabricated or in bad faith).

No Director, officer, or employee who in good faith reports a suspected violation shall suffer harassment, retaliation, or adverse employment consequence based on the reporting of such a violation. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including suspension and termination of employment.

i. Investigation

An investigation will be conducted as discreetly as possible to avoid any embarrassment to the parties involved. Both the complainant (if not anonymous) and the alleged offender will be separately interviewed, as will any individual who may be able to provide relevant information. Every complainant (if not anonymous) is expected to cooperate in any investigation if so requested. The outcome of the investigation will be communicated to the complainant (if not anonymous). Where the complainant is dissatisfied with the outcome of the investigation, he/she may appeal to the Chief Executive Facilitator (or the Board of Directors, if the Chief Executive Facilitator was implicated in the complaint) in writing within 14 days from the date he/she is officially informed of that outcome.

ii. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to an extent possible that is consistent with the need to conduct an adequate

investigation. The complainant is encouraged to cooperate with the investigation, and should note that FS might be unable to effectively deal with anonymous complaints.

iii. False accusations

Although FS encourages all persons to report any violation of FS policies, any deliberately and knowingly false accusations, fabricated allegations or otherwise complaints against another made in bad faith are considered a misconduct, and there may be disciplinary measures taken against the complainant for making accusations, allegations or complaints of such nature.

iv. Disciplinary Measures, Restitution and Appeal

If the investigation reveals sufficient evidence to support the complaint and it is upheld, the offender will be disciplined. The nature and severity of the disciplinary measures will commensurate with the gravity of the violation. Such measures may therefore include suspension or immediate dismissal. The incident will also be documented in the offender's file.

Restitution for unfounded complaint: An employee accused and found not guilty of violation will be granted restitution deemed appropriate by FS in its discretion for any direct and foreseeable pecuniary loss suffered by him/her. For instance, where interim suspension without pay pending resolution of the complaint is instituted, such payment shall be reinstated.

v. Police and MACC

Please note that the process to report and/or investigate Code violations is not the only avenue, even though FS encourages all complaints (except when clearly criminal in nature) be raised and resolved first within FS. Any individual may contact the relevant authorities, including the Police and the Malaysian Anti-Corruption Commission (MACC), in the event that the individual believes that the internal process of FS has failed to adequately resolve the complaint.