



# SKOM

## Whistleblowing Policy

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### POLICY

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<b>Originator:</b>	Corporate Office	<b>Applicable To:</b>	SKOM
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<b>Approved by:</b>	Board of Directors of SKOM		

## Abbreviations

In this Whistleblowing Policy, the following abbreviations shall have the following meaning unless otherwise stated:

AC	Audit Committee		BOD	Board of Directors
CoC	Code of Conduct and Ethics		HODs	Head of Departments
LRC	Legal, Risk & Compliance		HRA	Human Resources & Administration

## 1.0 Objectives

- 1.1 SKOM Sdn. Bhd. ("SKOM") is committed to the highest standards of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible, and transparent manner.
- 1.2 This Whistleblowing Policy is to provide an avenue for all directors, officers and employees of SKOM and external third parties (including vendors, contractors, advisers and other third parties) to report in good faith any real and genuine concern of any Improper Conduct (as set out in Section 2.2) whilst providing protection for such person who report such allegations against risk of reprisals.

## 2.0 Scope

- 2.1 Any of the following persons (hereinafter referred to as a "Whistleblower") acting reasonably and in good faith, may report to SKOM any suspected or actual Improper Conduct committed by any employee, director and officer within SKOM:
  - i. the employees;
  - ii. BOD;
  - 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 SKOM; and
  - iv. members of the public.
- 2.2 For the purposes of this Whistleblowing Policy, improper conduct (hereinafter referred to as a "Improper Conduct") includes the following:
  - i. criminal offences by a director, officer or employee including bribery, fraud, corruption or abuse of power;
  - ii. misappropriation of funds or assets, theft, embezzlement or gross mismanagement;
  - iii. financial irregularity or impropriety;
  - iv. breach of SKOM's CoC;
  - v. act, omission, misrepresentation or concealment of information which may lead to, cause or create a substantial or specific danger to the lives, health, or safety of SKOM's employees or the public;
  - vi. failure to comply with laws or regulatory requirements;
  - vii. serious conflict of interest without disclosure; and
  - viii. knowingly assisting, directing or advising a person to commit or attempt to suppress or conceal any information relating to any of the above improper conduct.

The above list is not exhaustive and includes any act or omission, which if proven, will constitute any criminal offence under relevant legislations in force.

- 2.3 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.
- 2.4 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 as soon as reasonably possible.
- 2.5 All Whistleblowers are assured that any report or disclosure made to SKOM which are made in good faith or belief, without malicious intent on any suspected or actual Improper Conduct, will be accorded protection of confidentiality of identity to the extent reasonably practicable. Such protection is accorded to all Whistleblowers even if the investigations on the suspected breach or violations later reveal that the Whistleblower is mistaken as to the facts and/or the rules and procedures involved.

### 3.0 Reporting Procedures

3.1 If an employee is faced with or encounters a concern or situation which could involve an Improper Conduct, he/she may raise his/her concern to his/her HOD or the LRC Department via email or letter. The employee may escalate to the Whistleblowing Committee directly in the event that:

- i. the employee has no confidence in the integrity or reliability of the HOD or LRC Department; or
- ii. the HOD or LRC Department is the subject of or is implicated in the report; or
- iii. the HOD or LRC Department fails to take appropriate action.

3.2 An external party Whistleblower may make a report or complaint through the following secured reporting channels including reports made in email or letter to the Whistleblowing Committee. The contact details are as set out below:

**by email:** the Whistleblower may use the dedicated email address set out below to make the report or complaint:

[actnow@ncl.com.sg](mailto:actnow@ncl.com.sg)

**by letter:** the Whistleblower may address the letter to the LRC Department at the following address:

**B03-B-17-1, Menara 3A,  
KL Eco City,  
No. 3, Jalan Bangsar  
59200 Kuala Lumpur**

3.3 The key information or documents listed below are to be provided by the Whistleblower to facilitate further investigation, if required:

- a. Information on Whistleblower
  - i. Name (\*)
  - ii. Designation
  - iii. Contact Number
  - iv. Email Address (\*)
- b. Information on person being reported
  - i. Name
  - ii. Designation
  - iii. Contact Number
  - iv. Email Address
- c. Complaints / concerns
  - i. Incident date
  - ii. Affected parties
  - iii. Incident or event location
  - iv. Supporting documents (where applicable)
  - v. Other details or information which may assist the investigation

*\*May leave the information blank if the whistleblower wishes to remain anonymous.*

### 4.0 Screening

4.1. Initial screening will be conducted by the investigation committee which could include a telephone conversation, letter or email to the Whistleblower whom may be requested to provide further information or evidence supporting such a report. Such screening should promptly establish the facts and collect all necessary evidence, for example:

- i. making enquiries to establish the facts;
- ii. collecting together all relevant documents and other evidence;
- iii. obtaining witness statement; and
- iv. where possible and reasonable, request reports on the issue to be made in writing and signed by the individuals making them.

and thereafter assess the disclosure to determine whether it is related to a wrongdoing or excluded from the scope of this Policy and shall prepare general recommendations to the Whistleblowing Committee. This initial process shall take not more than two (2) weeks from the day the Whistleblowing Committee receives the disclosure.

## **5.0 Investigation**

- 5.1 Subsequent to the screening as set out at paragraph 4.0 above, the investigation committee shall as far as expedient, conduct an interview with the Whistleblower. The findings of the investigation shall as soon as possible, be reported to the AC or BOD for deliberation and for the appropriate action to be taken including the conduct of any domestic inquiry against the person being alleged to have committed an Improper Conduct. The person being alleged to have committed an Improper Conduct shall be informed of the detailed charge of the Improper Conduct against him by way of a show cause letter and he is instructed to justify and provide his written explanation.
- 5.2 In undertaking the investigations and any follow-up action, the investigation committee or any other person involved in the investigation will have to consider all relevant factors, including:
  - i. applicable laws (if necessary or appropriate, SKOM may obtain legal advice as to the position of SKOM, the Whistleblower or third party under the law);
  - ii. the safety of personnel;
  - iii. the risk of defamation when making statements;
  - iv. the protection of people making reports and of other involved or referenced in the report;
  - v. potential criminal, civil and administrative, liability, financial loss and reputational damage for the organization, to report to the authorities;
  - vi. keeping the issue and investigation confidential until the facts have been established; and
  - vii. the need for top management to require the full co-operation of personnel in the investigation.
- 5.3 Upon receiving the justification or written explanation of the person being alleged to have committed an Improper Conduct, the AC or the BOD shall make the final decision and such final decision shall be communicated to the Whistleblower by way of a notification letter.
- 5.4 The reporting procedure flowchart is as appended as Appendix 1 to this Policy.

## **6.0 Corrective Action**

- 6.1 The investigation committee shall carry out the decisions of the AC or the BOD in relation to the findings of the investigation on the allegation of an Improper Conduct against director, officer or employee. Corrective action that may be taken include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services with SKOM or other forms of action as set out in SKOM's Employee Handbook.
- 6.2 Whilst SKOM respects the rights of the Whistleblower to directly make reports of Improper Conduct to an Enforcement Agency or the relevant authorities, SKOM advises and urges the Whistleblower to report Improper Conduct to SKOM first so that SKOM can address and remedy any wrongdoings and where applicable, institute the appropriate controls to prevent any serious damage to SKOM.

## 7.0 Distinguishing Between Whistleblowing Reports and HR Grievances

- 7.1 To ensure that concerns are addressed through the appropriate channels, SKOM differentiates between whistleblowing reports and standard HR-related grievances and complaints.
- 7.2 Whistleblowing channels are specifically designated for reporting serious concerns such as unethical behaviour, legal violations, fraud, corruptions or threats to health and safety. These channels are not intended for routine employment issues such as performance evaluations, leave requests or interpersonal conflicts. Such matters should be managed in accordance with SKOM's Employee Handbook and Code of Conduct.
- 7.3 Where to address your concern:

Type of Concern	Examples	Reporting Channel	Recipient
Whistleblowing Serious misconduct / Regulatory breach	Fraud, bribery, corruption, accounting irregularities, misuse of assets, falsification of records, safety violations posing serious risk, deliberate concealment of wrongdoing, serious breach of law or SKOM's policy	<a href="mailto:actnow@ncl.com.sg">actnow@ncl.com.sg</a>	Whistleblowing Committee
HR – Related Grievance (Employment Matters)	Leave approval issues, performance review concerns, workplace conflicts or harassment complaints, unfair workload distribution	<a href="mailto:wecare@ncl.com.sg">wecare@ncl.com.sg</a>	Head of HRA / HRA Department

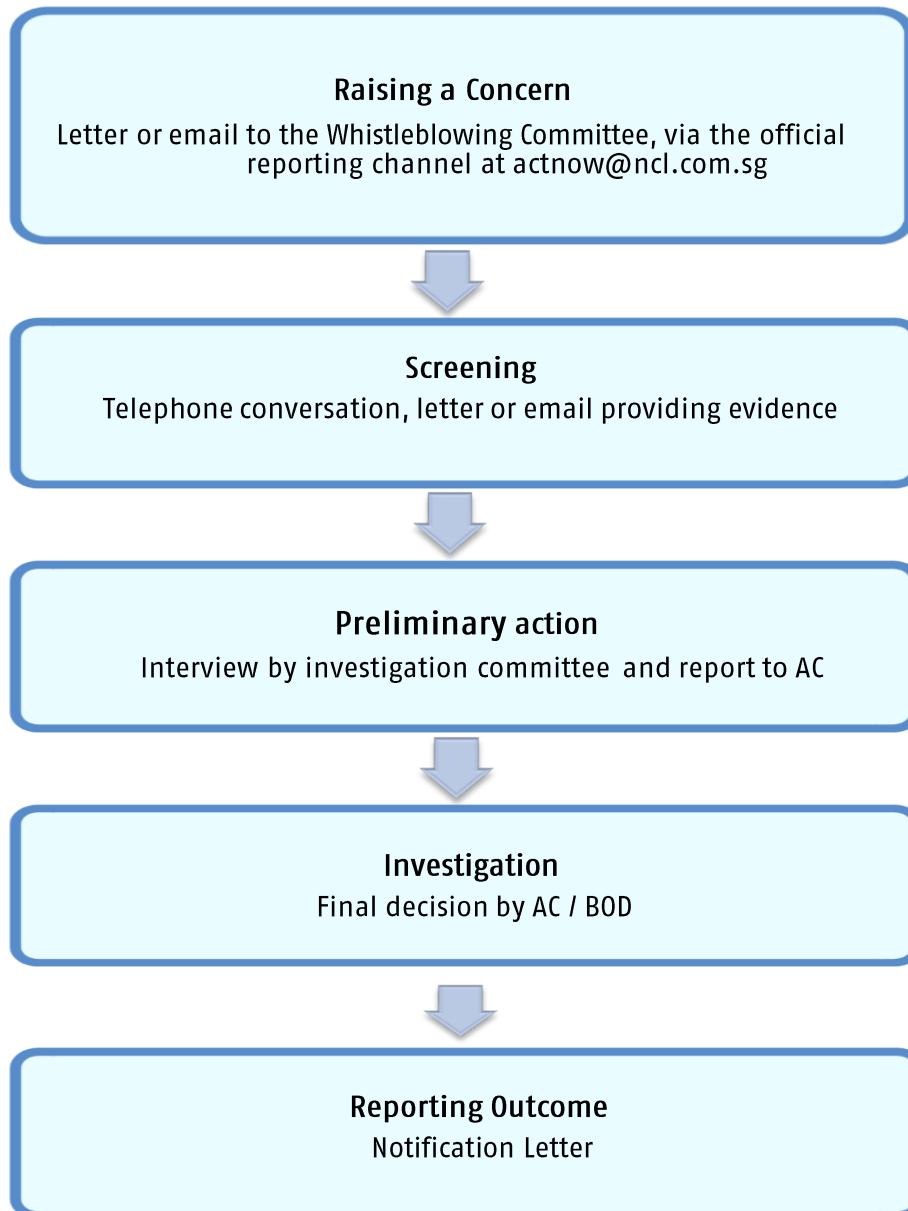
## 8.0 Maintaining Records

- 8.1. The LRC Department shall maintain appropriate records of Improper Conduct, its handling of the Improper Conduct, and the outcome of all whistleblowing reports. These records should be maintained for the appropriate period as required by law.

## 9.0 Reviews and Changes to this Whistleblowing Policy

- 9.1 The LRC Department shall periodically review this Whistleblowing Policy and may recommend to the BOD any amendments to this Whistleblowing Policy.

## Appendix 1



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