

IMPORTANT NOTES FROM WHISTLEBLOWING POLICY OF THE PNB GROUP

1. Introduction

- 1.1 Whistleblowing can be defined as deliberate, voluntary disclosure or reporting of an individual or organisation malpractice, wrongdoings, or suspected Improper Conduct within the organisation by any person.
- 1.2 PNB observes high standards of business and personal ethics in carrying out its duties and responsibilities. PNB upholds honesty and integrity in fulfilling its roles and complies with all laws and regulations.
- 1.3 PNB encourages all concerned parties to highlight any concerns of Improper Conduct without fear of detrimental action, victimisation or discriminatory treatment.

2. Scope of Policy

- 2.1 The Whistleblowing Policy of the PNB Group (Policy) is intended to facilitate disclosures relating to corruption/bribery, wrongdoings, malpractices, misdemeanor, illicit dealings, offensive behaviour, indiscipline, any violation of established policies and procedures or any action harmful to the reputation and interest of PNB in its commitment to promote greater level of transparency and accountability.
- 2.2 This Policy covers all complaints of Improper Conduct concerning BOD members, senior management and employees of PNB Group, and any other person providing services to PNB Group, including consultants, vendors, trainers, independent contractors, suppliers, agents, external agencies and/or any other party with a business relationship with PNB Group.

3. Reporting Procedure

A Whistleblower shall make a disclosure of Improper Conduct either using the prescribed form or through any of the following channels but not limited to:

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- (a) Telephone Line: +603-20505294
- (b) Email: CIgO@pnb.com.my
- (c) Mail Address: Chief Integrity Officer, Compliance & Integrity Division, Permodalan Nasional Berhad, 26th Floor, Menara PNB, 201-A, Jalan Tun Razak, 50400 Kuala Lumpur.
- (d) PNB Website: https://www.pnb.com.my/02_8CorruptionFree_EN.php

4 Definitions and Interpretations

Term	Definition
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: <ul style="list-style-type: none"> (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.
Improper Conduct	: Any conduct which may constitute as a disciplinary or criminal offence.
PNB	: Permodalan Nasional Berhad.
PNB Group	: Permodalan Nasional Berhad and/or the following entities, whichever is applicable: <ul style="list-style-type: none"> (a) Amanah Saham Nasional Berhad; (b) Pelaburan Hartanah Nasional Berhad; (c) PNB Merdeka Ventures Sdn Berhad; (d) PNB Research Institute Sdn. Bhd; and (e) Any other company and/or entity sanctioned by the Board of Directors.

Whistleblower : Means any concerned party who makes a disclosure of Improper Conduct.

5 Confidentiality

- 5.1 Any person having knowledge of a report of Improper Conduct shall make all reasonable efforts to maintain the confidentiality of the Confidential Information, in particular the identity of the Whistleblower.
- 5.2 The Whistleblower, the recipient of the report made under this Policy or any person who is involved in the investigation process shall not disclose information relating to disclosure or any part thereof, proceedings or outcome of, except where:
- i) disclosure is made to those who are authorised under this Policy and have a legitimate need to know; or
 - ii) disclosure is made to any third party on a strictly confidential basis for the purposes of obtaining professional advice; or
 - iii) disclosure is required by law or any statutory authority.