

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 employees of PNB and any other person providing services to PNB, including consultants, vendors, trainers, independent contractors, suppliers, agents, external agencies and/or any other party with a business relationship with PNB.

3. Reporting Procedure

A Whistleblower may make a disclosure of improper conduct to the Integrity Unit of PNB in writing, using secured channels such as online form, e-mail or regular mail, containing brief summary of the improper conduct.

4 Definitions and Interpretations

Term	Definition
Improper Conduct	: Means any conduct which may constitute as a disciplinary or criminal offence.
PNB	: Means Permodalan Nasional Berhad and/or the following entities, whichever is applicable: (a) Amanah Saham Nasional Berhad; (b) Pelaburan Hartanah Nasional Berhad; (c) PNB Merdeka Ventures Sdn Berhad; (d) PNB Management Services Sdn Berhad; 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 The Whistleblower, the recipient of the report made under this Policy or any person who is involved 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.