

# **IMPORTANT NOTES FROM WHISTLEBLOWING POLICY OF THE PNB GROUP**

## **1. Introduction**

- 1.1 Whistleblowing can be defined as deliberate, voluntary disclosure or reporting by any person, of a criminal misconduct, breach of ethics, breach of code of conduct and breach of organisational policies.
- 1.2 PNB Group (as defined herein) observes high standards of business and personal ethics in carrying out its duties and responsibilities. PNB Group upholds honesty and integrity in fulfilling its roles and complies with all laws and regulations.
- 1.3 PNB Group encourages everyone to highlight any concerns of Improper Conduct (as defined herein) 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 criminal misconducts, corruption/bribery, wrongdoings, malpractices, misdemeanors, illicit dealings, offensive behaviours, indiscipline, any violation of established policies and procedures or any action harmful to the reputation and interest of PNB Group in its commitment to promote greater level of transparency and accountability. It is also meant to assist PNB Group in preventing or reducing undesired effects of Improper Conduct in its efforts to achieve continual improvement.
- 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 or with a business relationship with PNB Group, including but not limited to 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 may make a disclosure of Improper Conduct through any of the following channels:

- (a) **Telephone Line** : +603-26393797 (Monday – Friday, 8.30 am – 5.30 pm, except Public Holidays)
- (b) **Emails** : [ClgO@pnb.com.my](mailto:ClgO@pnb.com.my) or [BCC\\_Chairman@pnb.com.my](mailto:BCC_Chairman@pnb.com.my)
- (c) **Mail Address** : Chief Integrity Officer, Compliance & Integrity Division, Permodalan Nasional Berhad, Level 89, Menara Merdeka 118, Presint Merdeka 118, 50118 Kuala Lumpur; or  
Chairman of Board Compliance Committee, Permodalan Nasional Berhad, Level 91, Menara Merdeka 118, Presint Merdeka 118, 50118 Kuala Lumpur
- (d) **PNB Website** : <https://www.pnb.com.my/en/compliance-integrity-en>

### 4 Definitions and Interpretations

Term	Definition
Confidential Information	: Any information that is by its nature confidential or sensitive and/or not generally made available to the public which includes: <ul style="list-style-type: none"><li>(a) information about the identity, rank, position, or other personal details of a Whistleblower; or</li><li>(b) a person against whom a Whistleblower has made a disclosure; or</li><li>(c) information disclosed by a Whistleblower; or</li><li>(d) information that, if disclosed, may cause detriment to any person.</li></ul>
Improper Conduct	: Any conduct or behaviour 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: (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 person who makes a disclosure of Improper Conduct.

## 5 Confidentiality

- 5.1 Any person who has knowledge of a report of Improper Conduct shall make all reasonable efforts to maintain the confidentiality of the Confidential Information of the report, in particular the identity of the Whistleblower in the report.
- 5.2 The Whistleblower, the recipient of the report (made under this Policy) or any other person(s) who is involved in the investigation process shall not disclose information relating to the report, or any part thereof, proceedings or investigation outcomes, except where the:
  - 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.