

**GUARDIAN SECURITY CONSULTANTS SDN BHD
WHISTLEBLOWING POLICY**



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1. POLICY STATEMENT

Guardian Security Consultants Sdn Bhd (“**GSC**” or “**the Company**”) is committed to good business ethics and integrity. All employees are encouraged to raise genuine concerns on improper conduct or wrongful act committed within the Company at the earliest opportunity, and in an appropriate way.

2. PARTIES THAT MAY RAISE CONCERNS

- Any employee of GSC.
- Any (legal or natural) person providing services to, on behalf of, or having a business relationship with GSC.

3. TYPES OF CONCERNS THAT MAY BE RAISED

You should raise any concerns about any improper conduct or wrongful act that is committed within the Company, including but not limited to:

- Any criminal offences, including fraud, corruption, bribery and blackmail
- Any failure to comply with legal or regulatory obligations
- Any improper conduct which would be a disciplinary offence
- Any gross mismanagement of the Company’s affairs
- Any act or omission which jeopardises the health and safety of any employee of GSC or any member of the public

Please note that any grievance of a personal nature should be raised through the HR grievance procedures and not through this Whistleblowing Policy or the Whistleblower Form.

4. WHO SHOULD YOU RAISE YOUR CONCERNS TO

Reports of any such concerns may be made to:

Dato’ Law Hong Soon
Director of Guardian Security Consultants Sdn Bhd
In writing: Level 10, Wisma Hong Leong, 18 Jalan Perak, 50450 Kuala Lumpur, Malaysia
By email: dato'_law@guardiansecurity.com.my

Please include your full name and contact details, as well as full details of your concern and any supporting documentation you consider relevant. Should you wish to do so, you may use our [Whistleblower Form](#) to provide the details required.

GSC reserves the right not to investigate any alleged Improper Conduct which is raised anonymously.

Additionally, you also have the right to raise your concerns with the relevant regulators or law enforcement agencies.

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5. ACTIONS WHICH MAY BE TAKEN AGAINST YOU

- (i) Subject to paragraph (ii) below and to the extent permitted by law, you will be protected from retaliation, adverse employment action or legal action, and where feasible from disclosure of your identity, provided your report is made in good faith (even if you are genuinely mistaken in the concerns you raise).

- (ii) Your protection may be revoked and appropriate action may be taken against you if:
 - a. You have participated in the Improper Conduct disclosed;
 - b. You made a material statement which you knew or believed to be false or did not believe to be true;
 - c. The disclosure of the improper conduct is frivolous or vexatious;
 - d. The disclosure of the improper conduct is made maliciously; or
 - e. The disclosure of the improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

Please note that we may have to disclose your personal information to the board of directors and investigation team in order to follow up and, if appropriate, act on your complaint, and where required by law or regulatory authorities to release your personal information. Please take note that we may not be able to conduct the investigation or the investigation may be affected if you object to the disclosure of your personal information.

7. WILL YOU BE INVOLVED IN THE INVESTIGATION?

You will only be requested to assist when more information is needed during the investigation of the alleged Improper Conduct.

WHISTLEBLOWER FORM

You should raise any concerns about any improper conduct or wrongful act that is committed within GSC. If your concern is about your personal position, it will be more appropriate for you to raise your concern through HR grievance procedures.

YOUR RELATIONSHIP WITH GSC	Please tick all applicable: Employee: <input type="checkbox"/>
	NON-EMPLOYEE: Please specify your relationship. Please include your employer's details if your employer provides services to or otherwise has a business relationship with GSC.
<i>If you are a GSC staff</i> YOUR STAFF ID: YOUR DEPARTMENT: YOUR POSITION / DESIGNATION	
YOUR CONTACT DETAILS	Name: Address: Telephone: Email:

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DETAILS OF YOUR CONCERNS (please provide as much information as possible)
DESCRIPTION OF IMPROPER CONDUCT : (use the additional information sheet, if necessary)
WHERE DID THE IMPROPER CONDUCT OCCUR?
WHEN DID THE IMPROPER CONDUCT OCCUR?
NAME AND POSITION OF PERSON(S) INVOLVED:
DETAILS OF ANY WITNESS(ES):
DID YOU REPORT THE IMPROPER CONDUCT TO ANY AUTHORITIES? IF YES, PLEASE GIVE DETAILS:
SUPPORTING DOCUMENT(S) ATTACHED (Please tick)? Yes <input type="checkbox"/> No <input type="checkbox"/>

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ADDITIONAL INFORMATION SHEET

ANY ADDITIONAL INFORMATION:

Provide any further details you think may be relevant, for example, whether you approached the person(s) concerned, any financial impact to GSC, etc.