

a) Purpose

BPMB Group is committed to the highest standards of ethical, integrity, accountability and legal conduct.

BPMB Group is committed to uphold the Malaysia's Anti-Corruption Principles in promoting integrity, transparency and good governance in all aspects of its operation upon signing the Corporate Integrity Pledge.

The Whistleblowing Policy is intended to assist individuals to whistleblow on concerns which they have discovered and to provide protection to the whistleblower, in-line with the protection accorded by the Whistleblower Protection Act 2010.

b) Applicability

Applicable to directors, staff, subsidiaries and any other persons where BPMB Group has established relationship including, but not limited to, agents, consultants, suppliers, vendors and service providers.

Member of the public are also encouraged to whistleblow should they have discovered any concerns pertaining to BPMB Group's practice.

c) Disclosure of concerns is divided into 2 categories:-

1. Whistleblowing

Scope of Whistleblowing is listed below:-

- i. Abuse of power;
- ii. Breaches of applicable laws & regulations;
- iii. Bribery;
- iv. Corruption;
- v. Conflict of interest;
- vi. Embezzlement or theft;
- vii. Fraud;
- viii. Illegal activities
- ix. Misconduct;
- x. Misuse of BPMB Group Property; and
- xi. Any other matter that may be deemed reputational risk.

2. Grievances

All concerns which does not fall under the scope of (a) mentioned above shall be categorized as grievances i.e. discipline, demotion, harassment, improper classification or denial of earned overtime etc (minor misconduct as stated in BPMB Group's Employee Code of Ethics and Conduct).

d) Level of Anonymity

Below are the levels of anonymity adopted by BPMB Group:-

1. Anonymous - Whistleblower is not willing to reveal his/her identity
2. Confidential (restricted)/ Partially Anonymous - Whistleblower is partly willing to reveal his/her identity.
3. Non-anonymous - Whistleblower is willing to disclose his/her identity in making Disclosure.

e) Channels to Whistleblow

Any disclosure of concerns should be made in writing containing the background and history of the misconduct, the names of the persons involved, where and when the misconduct took place and other relevant information to assist the investigation along with supporting evidence, if available.

The disclosure shall be made in writing (sealed mail) to any of the following members:

1. Chairman of Board of Director (BOD) or Chairman of Group Audit & Examination Committee (GAEC); or
2. Management of BPMB Group; or
3. External Independence Party (applicable for staff of BPMB Group).

All areas under the scope of Whistleblowing will be deliberated at the Whistleblowing Committee (WBC) except for Grievances which shall be escalated to Group Human Resource (GHR).

Investigations shall be carried out by BPMB Group to support the authenticity of the disclosures made by the Whistleblower.

f) Protection to Whistleblower

BPMB Group is committed to provide protection (to the extent reasonably practical) to the whistleblower provided that the disclosure was made in good faith. This includes the confidentiality of identity, immunity from civil or criminal action and protection against any detrimental action against the whistleblower. Should the whistleblower encounter any retaliation, harassment or demotion arising from the whistle blowing, an immediate report needs to be made to Chairman of BOD or Chairman of GAEC or Chairman of WBC.

Additionally, the whistleblower may also make complain to the relevant enforcement authority of any detrimental or reprisal action committed by any person against him, where relevant.

The Bank has the right to revoke the protection to the whistleblower should the following incidences is discovered:

1. The whistleblower himself has participated in the improper conduct disclosed;
2. The whistleblower willfully made in his disclosure of improper conduct a material statement which he knew or believed to be false or did not believe to be true;
3. The disclosure of improper conduct is frivolous (i.e. not having any serious purpose or value) or vexatious (i.e. causing or tending to cause annoyance or frustration);
4. The disclosure of improper conduct principally involves questioning the merits of government policy, including policy of a public body;
5. The disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
6. The whistleblower, in the course of making the disclosure or providing further information, commits an offence under Whistleblower Protection Act.

g) Alternative Avenues to Whistleblow

If the whistleblower is not satisfied with the result of the investigation or if he/she wishes to seek alternative avenues in making the disclosure, the following enforcement agencies may be contacted, where appropriate to Polis Diraja Malaysia PDRM) or Malaysia Anti-Corruption Commission (MACC).

Appendix 1: Whistleblowing Form