YP MAINTENANCE SDN. BHD.
201301003946 (1033787-X)



WHISTLEBLOWING POLICY

INTEGRITY UNIT

YP MAINTENANCE SDN. BHD.

A. INTRODUCTION

In line with best governance practices, YP Maintenance Sdn. Bhd. (YPMSB) encourages all parties, whether YPMSB staff, external parties dealing with YPMSB or the public, to lodge complaints related to the integrity of YPMSB staff.

B. OBJECTIVES

To establish a structured and confidential mechanism for employees of YPMSB and members of the public to report suspected improper conduct, and to ensure that whistleblowers are protected from any form of retaliation.

C. TERMINOLOGY

1. **Integrity Complaints**

   Any complaint by YPMSB staff, external parties dealing with YPMSB or the public to report any misconduct of YPMSB members, weaknesses in systems and work procedures, acts of corruption, malpractice and abuse of power or illegal actions.

2. **Whistleblower**

   Any person who makes disclosure of misconduct to the enforcement agency (refer to the definition of “enforcement agency” under Section 2, Act 711) including YPMSB employees.

3. **Improper conduct includes and not limited to the following:**

   a. Corruption;
   b. Fraud;
   c. Bribery;
   d. Misuse of Company’s property;
   e. Conflict of Interest;
   f. Abuse of Power;
   g. Any other general malpractice including Security, Health & Safety risks.

4. The above list is not exhaustive and includes any acts or omissions, which is proven, will constitute an act of misconduct under the Company’s Code of Conduct or any criminal offences under the relevant legislations in force.

D. RECEIPT OF COMPLAINTS

1. To ensure that integrity complaint management can be implemented effectively, the Integrity Unit accepts all complaints that are equipped with solid information and evidence except for personal/ internal staff conflict issues.

2. A complaint should contain the following basic points:
   a. What was the mistake made?
   b. Who is involved and who can help (complainants/ complained officers/ witnesses etc)?
   c. When did it happen (date/time etc)?
   d. Where is it done (location, building, position and others)?
   e. How does it happen?
   f. Supporting documentation (evidence/ photographs/ recordings etc.)
   g. Identity of the complainant/whistleblower (name, phone number and email)

3. All integrity complaints must be submitted to the Head of the Integrity Unit. Complaints can be made through the following channels:

   Whistle Blowing Channels

   i. **By mail or hand delivery to:**
   Integrity Unit
   YP Maintenance Sdn. Bhd.
   B800, Jalan Al-Sultan Abdullah,
   25200 Kuantan, Pahang.
   ii. **By telephone:** 09-5164400 ext.109 / 444
   iii. **By email:** whistleblower@ypmaintenance.com.my
   iv. **By scanning the QR Code below to submit an online report:**

   v. **By submitting the Whistleblower Form** to the Integrity Unit through any of the above channels.

4. The Head of the Integrity Unit shall evaluate and conduct detection and verification of complaints received. Next, prepare a preliminary report for the determination of further actions.

E. INVESTIGATION

1. All complaints reported by complainants through the channels provided will be investigated transparently and fairly as stipulated in the Whistleblowing procedure.

2. The assurance of confidentiality for integrity complaints is limited to the Head of Integrity Unit and Investigating Officer only will be allowed to have access to the personal information and details of the complaint submitted.

3. Only the general details of the complaint will be disclosed and reported in the relevant meeting, while the complainant's personal information will be kept confidential based on YPMSB practices.

4. Meanwhile, under the Whistleblower Protection Act 2010 (Act 711), whistleblowers can disclose the information to any enforcement agency such as the Royal Malaysian Police (PDRM) and the Malaysian Anti-Corruption Commission (MACC).

5. According to this Act, disclosure can be made orally or in writing. The authorized officer shall convert it into written form. Disclosures can be made by email, phone or letter but the complainant needs to be present for verification.

6. To protect the whistleblower, the authorised officer will contact the whistleblower to attend an appointment so that the protection under this Act can be implemented.

7. Whistleblowers who disclose improper conduct (complaints), will be given protection under this Act. However, it can be revoked under section 11 of this Act as follows:

   a. The whistleblower himself has participated in the improper conduct;
   b. The whistleblower intentionally made a false statement;
   c. Exposure is trivial or troublesome;
   d. The disclosure is made solely to avoid dismissal/other disciplinary action; and
   e. The whistleblower has committed an offence under this Act.

F. REPORTING

1. Integrity Complaint reports and analysis will be prepared by the Integrity Unit or any Department such as Human Resources or Independent Bodies shall be based on the requirements of ISO 37001:2025 Standard and best governance.

2. Reporting must be presented at the Management Review Meeting (MRM) and comply with the requirements of ISO 37001:2025 Standard and YPMSB best governance.

3. Based on the findings and the causes of the problems identified, continuous improvements can be made in the Anti-Bribery Management System (ABMS) and the best governance of the YPMSB.

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