



WHISTLE-BLOWING POLICY AND PROCEDURES

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1. OBJECTIVES

This policy sets out by which employees and stakeholders of the Company may, in confidence, raise concerns about possible misbehaviours that he/she is aware of at their respective delegated workplace and/or work responsibility.

2. REVIEW

This policy is reviewed and updated in accordance with the needs of the Company.

3. INTRODUCTION

All employees and stakeholders of the Company are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

This Policy is designed to:

- a) support the Company's values;
- b) ensure employees and stakeholders of the Company can raise concerns without fear of reprisals; and
- c) provide a transparent and confidential process for dealing with concerns.

This policy not only covers possible improprieties in matters of financial reporting, but also:

- a) fraud;
- b) corruption, bribery or blackmail;
- c) criminal offences;
- d) failure to comply with a legal or regulatory obligation;
- e) miscarriage of justice;
- f) endangerment of an individual's health and safety; and
- g) concealment of any or a combination of the above.

4. PRINCIPLES

The principles underpinning this policy are as follows:

- a) all concerns raised will be treated fairly and properly;
- b) the Company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- c) any individual raising a concern is aware of who is handling the matter; and
- d) the Company will ensure no one will be at risk of suffering some form of retaliation as a result of reporting a concern even if the individual is mistaken. The Company, however, does not extend this assurance to someone who maliciously report a matter he/she knows is untrue.

5. PROCEDURES

If any employee and stakeholders of the Company believes reasonably and in good faith that malpractice exists in the work place, the employee and stakeholders of the Company should report the concern to the **Integrity Committee** via the following channel:

triterra@whistleblowing.com.my

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6. **ACTIONS**

The **Integrity Committee** receiving the report shall investigate all reports and discussed the progress of investigation within the **Integrity Committee promptly**. All report received will be treated as confidential.

The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as law permits it or the person making the report indicates that he/she no longer wishes to remain anonymous.

Upon completion of investigation, appropriate course of action will be recommended to the Integrity Committee for their deliberation. Decision taken by the Integrity Committee will be implemented immediately, if, within Integrity Officer’s authority. Integrity Officer shall report the cause and action taken to the Integrity Committee in the next immediate scheduled meeting.

Matters beyond Integrity Officer’s authority shall be reported directly to Integrity Committee for deliberation and decision making.

The **Integrity Committee** is responsible to safe keep and maintain all reported documents.