

PET WORLD INTERNATIONAL GROUP OF COMPANIES

WHISTLEBLOWING POLICY STATEMENT

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BACKGROUND

Pet World International Sdn Bhd and its group of companies (“PWI”) is committed to the highest profession standards of Integrity and strives to provide assurance to all our stakeholders that we operate our businesses ethically and in accordance with applicable laws and regulations. Recognizing the abovementioned values, PWI provides avenue for all employees of PWI and members of the public to disclose any improper conduct within PWI.

Objective of the Policy

This policy is to provide an avenue for all employees of PWI and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

Scope of the Policy

Any improper conduct (misconduct or criminal offence) of a staff of PWI including but NOT limited to the following:

- i. Any form of financial crime, including fraud;
- ii. Bribery and corruption;
- iii. Harassment, abuses and intimidation;
- iv. Conflict of Interest and potential abuse of position for personal gains;
- v. Serious breach of the PWI’s Code of Ethics and Conduct;
- vi. Disclosure of sensitive data or information to outsiders (third party);
- vii. Misuse of the PWI’s Property;
- viii. Non-Compliance to PWI’s Policies and Procedures;
- ix. Regulatory breaches or non-compliance to regulatory requirements.

Only genuine concerns should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.

If the investigation later reveals that the disclosure was made with malicious intent, appropriate action can be taken against the Whistleblower.

Reporting Channels

PWI through adequate means encourage its employees, stakeholders, service providers and members of the public to report an Incident via these reporting channels:

Email to the Whistleblowing Team: whistleblowing@petworld.com.my , or

Fill in the Whistleblowing form at <https://wahkong.net/wp-content/uploads/2020/07/PWI-Whistleblowing-form.pdf>

Reporting an Incident

Any disclosure made should contain the following information:

- i. Personal details of the Whistleblower (name, identification, email address, contact details, preferred method of communication, address)
- ii. Details of person(s) involved
- iii. Type and details of allegation
- iv. Time, location and dates of unethical conduct



- v. Witness (if any) to the unethical conduct
- vi. Lodging of report to another person/ department/ authority
- vii. Other relevant information and any available documentation or supporting evidence.

Whistleblowers are required to sign a declaration stating that information provided is true, correct and complete as well as allow the information provided to be used and processed for investigations, including where necessary, the forwarding of the information to the authorities.

Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within PWI, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Non-Disclosure of Identity

In order to enable PWI to accord the Whistleblower the necessary protection under the “Whistleblower Protection Act 2010” policy and also to obtain more details on the allegation / report, the Whistleblower is encouraged to disclose his/her personal details. However, Whistleblower may choose to remain anonymous, although in some instances it may limit the ability for thorough investigation due to insufficient information.

This Policy provides assurance that PWI will protect the confidentiality of all allegations raised and the identity of the Whistleblower at all times.

Protection Accorded to the Whistleblower

A Whistleblower will be accorded with protection under the policy provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken as to the facts as well as the rules and procedures involved.

This Policy provides assurance that if retaliation happens to an employee or external party, he / she must report to the Whistleblowing channels by substantiating the claim with factual information or documentation. If the act of retaliation is committed by an employee of PWI, the management will institute the necessary disciplinary action. However, if the act of retaliation is committed by an external party and if it's proven, PWI may take action to hold the external party accountable including instituting civil and / or criminal actions against him / her in the court of law.

Notification

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

This Whistleblowing Policy was adopted by the Board of Pet World International Sdn Bhd.

*This Whistleblowing Policy may be updated or amended from time to time by PWI.
(Last revised on 18 January 2021)*

