



# WHISTLEBLOWING POLICY

Name of policy: Whistleblowing Policy  
Version: 1

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## 1. Introduction

Swift Haulage Berhad and its Group of Companies (the “Swift Group of Companies” or “Swift”) is committed to high standards of ethical, moral and legal business conduct. In order to achieve these standards and in line with the Malaysian Code on Corporate Governance (MCCG), Swift has introduced this Whistle-Blowing Policy (“Policy”) to provide an avenue for employees and other relevant stakeholders to raise concerns and report, in good faith, any work malpractices or improper conduct in Swift and reassurance that they will be protected from reprisals or victimization for whistleblowing.

## 2. Scope of Reporting

“Improper conduct” means any conduct which, if proved, constitutes a disciplinary offence or a criminal offence.

Examples of what would constitute an “improper conduct” include, but not limited to the following:

- improprieties in matters of financial reporting;
- breach of the Swift Group of Companies’ codes of conduct, standards policies, procedures, practices etc;
- fraud, corruption, bribery or blackmail;
- failure to comply with laws, rules and regulations;
- endangerment of an individual’s health and safety;
- misuse of Swift Group of Companies’ property;
- theft or embezzlement;
- any unlawful act, whether criminal or civil in nature; and
- concealment of any or a combination of the above.

### 3. Duty to Act in Good Faith

- It shall be the responsibility of all parties to act in good faith with a reasonable belief that the information and allegation are substantially true.
- If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.
- Swift does not have the power to offer any person immunity against prosecution in the criminal jurisdiction if, and when the requirement to act in good faith and free from any malicious intent is breached.

### 4. Reporting Channels

Disclosure/ report can be made to any of the following dedicated reporting channels:

By a formal letter, attention to:

Chairman of Risk and Audit Committee  
Swift Haulage Berhad  
Suite 02, Level 8,  
Intan Millennium Square 2,  
88, Jalan Batai Laut 4, Taman Intan,  
41300, Klang.

By a formal report to dedicated email address: [compliance@swiftlogistics.com.my](mailto:compliance@swiftlogistics.com.my)

### 5. Disclosure of Report

Any disclosure made should contain the following information:

- description of the alleged event or matter (i.e., the nature of allegation; where (place) and when (time & date) the alleged misconduct/wrongdoing has taken place);
- details of the person(s) involved;
- other relevant information; and
- any supporting evidence.

## 6. Confidentiality

- All information received will be treated as strictly confidential, save for disclosure on a “need to know” basis to facilitate investigations and/or take appropriate actions for such investigations
- Swift will take all reasonable steps to protect the confidentiality of identity of a whistleblower, to the extent reasonably practicable and will adhere to any statutory requirements in force.
- Such protection will continue notwithstanding that the investigation later reveals that the whistleblower is mistaken as to the facts, rules and procedures of improper conduct.

## 7. Investigation Period

- It shall be the policy of the Swift Group of Companies to handle investigations promptly and as fairly as possible but it might not be possible to set a specified time frame for the conclusion of an investigation, as the nature of potential concerns varies.
- The Chairman of the Audit Committee may direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution.
- Swift reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

## 8. Protection for Whistleblower

It shall be the policy of the Swift Group of Companies to protect whistle-blowers who disclose concerns, provided the disclosure is made;

- in the reasonable belief that that it is intended to show malpractice or impropriety;
- to an appropriate person or authority; and

- in good faith without malice or mischief.

While all disclosures resulting from whistle-blowing shall be treated with high level of confidentiality, employee and other relevant stakeholders are required to disclose their full name in the report. Swift shall take the following into consideration in considering unanimous disclosure:

- seriousness of the issues being reported;
- significance and credibility of the concern; and
- possibility of confirming the allegation.

Whistle-blowers shall ensure that they do not make disclosure outside of the prescribed channels (e.g. media-print or electronic), or their disclosures may not be protected.

## **9. Review of the Policy**

Swift reserves the right to amend the Policy from time to time to maintain compliance with applicable laws and regulations or accommodate organisational changes within the Swift Group of Companies.

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