
	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 1 of 8

ABMS ISO 37001 WHISTLEBLOWING

Control Document

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	Name	Designation	Signatory	Date
Prepared by:				
Reviewed by:				
Approved by:				

	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 2 of 8

Revision History

Rev No.	Effective Date	Description Of Change	DCN No.
00	1 Dec 2020	Initial Release	001

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	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 3 of 8

TABLE OF CONTENT

1.0 Purpose 4


2.0 Scope 4

3.0 Responsibility 5

4.0 Reference 5

5.0 Procedure 6

6.0 Documented Information 8


	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 4 of 8

1.0 PURPOSE

- 1.1 Encourage personnel, business associates and public to report any attempted, suspected, and actual misconduct such as bribery, corruption, fraud, financial impropriety, gross mismanagement, or any violation of, or weakness in the anti-bribery and corruption management system.
- 1.2 Develop a culture of trust, transparency, integrity, impartiality and accountability in the conducts of its business affairs, while enabling reporting and prompt action to be taken through internal mechanisms.
- 1.3 Allow anonymous reporting and assure Whistleblowers protection from reprisals and victimization when reporting in good faith and on the basis of reasonable belief.

2.0 SCOPE

- 2.1 The procedure covers the following:
 - a. Reporting attempted, suspected or actual misconduct of any the Company's personnel, business associates and external parties.
 - b. Handling of Whistleblower's report
 - c. Ensure that every case follows the relevant process through to conclusion.
- 2.2 "Misconduct" means any unethical behavior, malpractice, illegal act or failure to comply with the Company's policy and procedures, including but not limited to:
 - i. breach of Employee Handbook requirements
 - ii. breach of the Policy
 - iii. breaches of code of conduct by business associate
 - iv. concerns about the Company's accounting treatments, internal controls or auditing matters
 - v. impropriety, bribery, corruption, act of fraud, theft
 - vi. misuse of the Company's properties, assets or resources
 - vii. conduct which is a violation of law
 - viii. abuse of power and authority
 - ix. gross mismanagement within the Company
 - x. serious conflict of interest without disclosure
 - xi. any other serious improper matters which may cause either financial or non-financial loss or damage to the Company's reputation
 - xii. acts that mislead, deceive, manipulate, coerce or fraudulently influence any internal or external auditors in connection with the preparation, examination, audit or review of any financial statements

	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 5 of 8

or records of the Company

- xiii. concealing information about any malpractice or misconduct.
- xiv. An act or omission which dangers to health and safety of other personnel or the environment of the Company.
- xv. Knowingly directing or advising personnel to commit any of the above misconduct.

2.3 Whistleblower means any person who make a report and raise concerns of misconduct to the Company.


2.4 Whistleblower may be personnel, business associates and members of the public.

3.0 RESPONSIBILITY

3.1 Integrity Officer is responsible for implementing this procedure.

4.0 REFERENCE

4.1 ISO 37001:2016 Clause 8.9 Raising concern

	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 6 of 8

5.0 PROCEDURE

5.1 Reporting Misconduct

5.1.1 The Company encourages personnel, business associates and public to report (hereinafter refer to as “Whistleblower”) in good faith or on the basis of a reasonable belief, suspected and actual misconduct involving the Company personnel and business associates, or any violation of or weakness in the anti-bribery management system.

5.1.2 Only genuine concerns should be reported under Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

5.2 Channels for Disclosure

5.2.1 Any concern should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported the channels below: -

Name : Giancarlo Maccagno

Email: giancarlo.maccagno@wascoenergy.com

Telephone : +603-26856800


Mail : Mark Strictly Confidential

Wasco Management Services Sdn Bhd
Suite 19.01 Level 19, The Garden North Tower,
Mid Valley City, Lingkaran Syed Putra, 59200, Kuala Lumpur

5.2.2 In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name : Halim Bin Haji Din

E-mail : halim.din@theiagroup.com

	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 7 of 8

Telephone : +603 2776 7388

Mark Strictly Confidential

Wasco Management Services Sdn Bhd
Suite 19.01 Level 19, The Garden North Tower,
Mid Valley City, Lingkaran Syed Putra, 59200, Kuala Lumpur

5.2.3 All reporting made by Whistleblowing channels will be addressed and assigned a unique case number with details of the information/allegation recorded in **Whistleblower Lodgment Form**.

5.3 Maintaining Confidentiality of Reporting

5.3.1 The information received from Whistleblower will be communicated to the Integrity Committee for assessment in strict confidential manner.

5.3.2 The details of reporting, identities of Whistleblower and other involved or reference may only be revealed to persons conducting investigations strictly on a "need to know" basis.

5.4 Anonymous Reporting

5.4.1 A Whistleblower is encouraged to identify himself/ herself when raising a concern or making a report to Whistleblowing channel. A Whistleblower may choose to lodge an anonymous report.


5.4.2 The Company will undertake not to reveal the identity of a Whistleblower to person conducting investigation without obtaining the prior consent of Whistleblower.

5.4.3 Identity of the Whistleblower shall only be revealed under the law requirements for the purpose of legal proceedings by or against the Company.

5.5 Prohibit Retaliation

5.5.1 Whistleblower reporting in good faith or on the basis of a reasonable belief, is assured of retaliation and is protected by the Company.

5.5.2 The Company views any harassments or retaliations in any form or manner against genuine Whistleblower seriously and will treat such action as gross misconduct, and if proven, may lead to dismissal.

	WASCO ENERGY LTD	Doc No: WEL-PR-23
	WHISTLEBLOWING	Rev No: 00
		Date: 1 Dec 2020
		Page: 8 of 8

5.6 Seeking Advices

5.6.1 If personnel are unsure as to whether a particular act or omission constitutes a misconduct, he/she is encouraged to seek advice or guidance from their superior, integrity officer or through Whistleblowing Channels.

6.0 Documented Information

No.	Description	Retention period	Maintained by
1.	Whistle Blower Lodgement	7 years	Integrity Officer
2.			
3.			