



**TH**PROPERTIES

(Wholly-owned subsidiary of Lembaga Tabung Haji)

## **TH PROPERTIES SDN BHD GROUP OF COMPANIES Governance Department**

**INCLUSION OF GOVERNANCE POLICIES IN TH PROP WEBSITE**

# SNAPSHOT OF TH WEBSITE ON THE INTEGRITY POLICIES

The screenshot shows the Tabung Haji website's integrity policy page. At the top, there's a navigation bar with links for Facebook, Twitter, Instagram, TikTok, YouTube, LinkedIn, OKU, Branch Locations, Contact Us, and a menu. A banner at the top says "WUQUF 15 JUNE 2024 / 9 ZULHIJJAH 1445H 164 DAYS LEFT". On the left sidebar, there are links for TH Integrity Plan, TH Business Code of Ethics, TH Supplier Code of Ethics, Integrity Pact in TH Procurement, and No Gifts Policy. The main content area has two sections: one about the TH Integrity Plan (with a download link) and another about the TH Business Code of Ethics (with a download link). Both sections include a small logo of a person holding a book.

**Integrity Policy**

**TH Integrity Plan**

As an Islamic organisation, **TH** continuously gives emphasis on upholding a high level of integrity and morals among staff aside from improving expertise and work competencies.

**TH** has been improving its governance without any compromise on malpractices, corruption and service quality which can be disputed by the public. **TH** also emphasises its efforts towards instilling a culture of integrity amongst its staff members.

**TH** Integrity Plan

The **TH** Integrity Plan outlines core strategies which are realised through programmes designed to encourage a culture of morality, ethics and integrity among stakeholders and customers while executing tasks and service deliveries.

Important elements in the **TH** Integrity Plan are the Code of Business Ethics, Code of Supplier Ethics, Integrity Pact in Procurement and **TH** No-Gift Policy.

Download for More Info.

**TH Business Code of Ethics**

**TH** believes that ethical business practice and a high degree of integrity will drive loyalty and trust among its stakeholders.

The **TH** Business Code of Ethics is a set of values and rules to maintain **TH**'s good reputation towards its business excellence.

**TH** Business Code of Ethics was drafted to achieve the following goals:

1. **TH**'s commitment in upholding integrity and ethical business practice based on values stated in the **TH** Client Charter.
2. Becomes a guideline for acceptable and unacceptable behaviours while conducting **TH** businesses from legal and ethical perspectives.
3. Helps **TH** to identify and manage ethical issues and fostering a culture of good values in line with **TH**'s Vision and Mission.

Download for More Info.

Link:

1. <https://www.tabunghaji.gov.my/en/corporate/integrity/integrity-policy#>
2. <https://www.tabunghaji.gov.my/en/corporate/integrity/e-whistleblowing>

## e-Whistleblowing

### Information Disclosure Policy (Whistleblowing)

Please take time to read and understand our Whistleblowing Procedure before submitting your disclosure.

### Information Disclosure Policy (Whistleblowing)

**TH** has established a Whistleblowing Policy to address misconducts in the workplace to allow **TH** members or the public to report breaches of the code of conduct and/or integrity, in a structured manner and with assurance that the identity of the Whistleblower is protected and remains confidential.

Misconducts such as fraud, serious financial malpractices and abuse of power that have been conducted and to be conducted by anyone appointed by **TH** can be reported through any of the following channels:

#### Channel

Any report can be lodged via [e-whistleblowing@th.gov.my](mailto:e-whistleblowing@th.gov.my) or in writing and in person at:

#### LEMBAGA TABUNG HAJI

#### Menara **TH** Tun Razak

201, Jalan Tun Razak

50400 Kuala Lumpur

(Attention to : Chairman of **TH** Lembaga OR Chairman of Audit and Governance Committee)

Having made an honest disclosure, based on reasonable cause and in accordance with the procedures set out under this Policy :

1. The Whistleblowers will be protected from retaliation in **TH** that stems directly from the disclosures they make; and
2. The identity of the Whistleblower will be protected, i.e. kept confidential unless required by law or for the purpose of any proceedings instituted by **TH** or against **TH**.

The identity and personal information of the informant and the alleged offender may be disclosed to persons involved in the investigation or any other process on a "need to know" basis.

## Current wording in TH website

### Dasar-dasar Integriti

Sebagai sebuah organisasi Islam, **TH** sentiasa memberi penekanan ke arah tahap integriti dan moral yang tinggi dalam kalangan anggota selain meningkatkan kepakaran dan kompetensi kerja.

**TH** telah menambah baik amalan tadbir urus tanpa bertolak ansur kepada penyelewengan, rasuah serta mutu perkhidmatan yang boleh dipertikai oleh masyarakat umum. **TH** turut memberi penekanan kepada usaha pembudayaan terhadap integriti dalam diri semua anggota **TH**.

#### Pelan Integriti **TH**

Pelan Integriti **TH** menggariskan strategi teras yang direalisasi melalui program-program yang dirangka untuk menyemarakkan pembudayaan akhlak, etika dan integriti dalam kalangan pihak berkepentingan dan pelanggan semasa melaksanakan tugas dan penyampaian perkhidmatan.

Elemen-elemen penting dalam Pelan Integriti **TH** ialah Kod Etika Perniagaan, Kod Etika Pembekal, Integrity Pact Dalam Perolehan dan Dasar Tidak Menerima Hadiah **TH**.

#### Kod Etika Perniagaan **TH**

TH percaya bahawa tatalaku perniagaan yang telus dan tahap integriti yang tinggi secara konsisten mampu mendorong kesetiaan dan kepercayaan semua pihak berkepentingan.

## Proposed wording in TH PROP website

### Governance Framework in TH Properties

TH Properties Sdn. Bhd. and its group of companies (hereinafter referred to as TH Prop) is a 100% subsidiary of Lembaga Tabung Haji. TH Prop cultivates integrity and manages the organisation's governance framework based on the Shariah compliance of its business operations.

TH Prop has improved governance practices without tolerating irregularities, corruption, level of service in addition to emphasizing the culture of integrity among TH Prop members.

The important elements in the TH Prop's Governance Framework were the Code of Conduct and Business Ethics, Code of Supplier Ethics, Anti Bribery & Corruption Policy and Gift, Entertainment and Hospitality Policy.

#### Code of Conduct and Business Ethics of TH Prop

TH Prop believes integrity, consistency, a transparent business conduct form the foundation of loyalty and trust in the organisation and among the stakeholders.

## Current wording in TH website

Kod Etika Perniagaan **TH** merupakan satu set nilai dan peraturan bagi memelihara reputasi baik **TH** ke arah kecemerlangan perniagaan.

Kod Etika Perniagaan **TH** dirangka untuk mencapai matlamat-matlamat berikut:

1. Melambangkan komitmen **TH** dalam menegakkan amalan perniagaan yang beretika dan berintegriti berdasarkan nilai-nilai yang terkandung dalam Piagam Pelanggan **TH**.
2. Menjadi panduan bagi kelakuan yang boleh diterima ketika menjalankan perniagaan **TH** dari sudut undang-undang dan etika.
3. Membantu **TH** mengenal pasti serta menguruskan isu-isu berkaitan etika dan memupuk budaya nilai murni selaras Visi dan Misi **TH**.

## Kod Etika Pembekal **TH**

Kod Etika Pembekal **TH** menggariskan prinsip, dasar dan peraturan yang wajib dipatuhi oleh setiap pembekal, pekerja dan subkontraktor kepada pembekal, ketika menyediakan barang atau perkhidmatan untuk **TH**.

Pembekal hendaklah memastikan Kod ini dikongsi bersama semua individu yang ditugaskan untuk melaksanakan kerja bagi atau bagi pihak **TH**. Pembekal juga hendaklah memastikan semua tugas berkaitan dengan **TH** dilaksanakan oleh individu yang mempunyai kemahiran, kepakaran dan sijil yang berkenaan.

## Proposed wording in TH PROP website

TH Prop's Code of Conduct and Business Ethics is a set of values and rules to maintain TH Prop's good reputation for business excellence.

TH Prop's Code of Conduct and Business Ethics is formulated to achieve the following objectives:

1. To foster TH Prop's commitment in upholding ethical business conduct and integrity based on the values outlined in the *Piagam Pelanggan TH Prop*.
2. Serves as a guide for acceptable behaviour from a legal and ethical standpoint when conducting TH Prop's business.
3. Assists in identifying and managing ethical issues while fostering a culture of good values in line with TH Prop's vision and mission.

## Code of Supplier Ethics of TH Prop

Code of Supplier Ethics outlines the principles, policies, and rules that must be adhered to by every supplier, employee, and subcontractor when providing goods or services to TH Prop.

The supplier shall ensure that this code is shared with all individuals assigned to perform work for or on behalf of TH Prop. The supplier also needs to ensure that all tasks related to TH Prop are carried out by individuals who have relevant skills, expertise and certificates.

## Current wording in TH website

### Integrity Pact Dalam Perolehan **TH**

Bagi meningkatkan kesedaran berkaitan kesalahan rasuah di kalangan anggota dan pihak-pihak yang berurusan dalam proses pemerolesan, **TH** telah memantapkan proses perolehan dengan meningkatkan tahap akauntabiliti, ketelusan dan kemampunan integriti melalui pelaksanaan *Integrity Pact*.

*Integrity Pact* merupakan satu proses aku janji oleh pembida/orang awam bahawa mereka tidak menawar atau memberi rasuah bagi mendapatkan kontrak atau mempercepatkan sesuatu urusan berkaitan perolehan **TH**.

Tujuan utama pelaksanaan *Integrity Pact* ialah untuk:

- Mengelakkan petender/ penyebut harga daripada menawar atau memberi rasuah;
- Menghendaki petender/ penyebut harga melaporkan sebarang kesalahan rasuah kepada pihak berkuasa;
- Memastikan **TH** tidak menanggung sebarang kos yang tidak perlu dalam urusan perolehan.

### Dasar Larangan Pemberian dan Penerimaan Hadiah

Dasar Larangan Pemberian dan Penerimaan Hadiah bertujuan untuk mengelak konflik atau percanggahan kepentingan dalam mana-mana urusan dengan **TH**.

## Proposed wording in TH PROP website

### Anti Bribery and Corruption Policy

To enhance awareness of bribery and corruption offenses among members of TH Prop, a policy was established in observing and ensuring that adequate procedures are in place to prevent, detect, and deal with potential bribery and corruption.

The objectives of this policy are:

- To set out the obligations of TH Prop and those engaged with or within TH Prop in adhering to and maintaining TH PROP's position on anti-bribery and anti-corruption.
- To ensure that TH PROP has adequate procedures to prevent and detect bribery and corruption.
- To furnish individuals working for or with TH PROP with the necessary information and guidance on identifying and addressing potential issues related to bribery and corruption.
- To protect against the possible penalties and repercussions resulting from acts of bribery and corruption or being associated with such behaviour.

### Gift, Entertainment and Hospitality Policy

Gift, Entertainment and Hospitality Policy is a policy to manage and administer gift, entertainment and hospitality as well registering, reporting and monitoring the implementation of this policy.

## Current wording in TH website

Dasar ini menetapkan bahawa anggota **TH**:

- Tidak menerima hadiah dari pihak luar; dan
- Tidak memberi hadiah kepada pihak luar.

## Proposed wording in TH PROP website

The policy dictates that members of TH Prop:

- Shall not accept gifts from external parties; and
- Shall not give gifts to external parties.

## Current wording in TH website

### E-Whistleblowing

Sila baca dan fahami Prosedur Whistleblowing kami sebelum menghantar pendedahan anda.

#### Dasar Pendedahan Maklumat (Whistleblowing)

**TH** telah mewujudkan Dasar Pendedahan Maklumat ("Whistleblowing Policy") salah laku di tempat kerja bagi memudahkan anggota **TH** atau orang awam melaporkan pelanggaran tatakelakuan dan/atau integriti, secara berstruktur dan dengan jaminan bahawa identiti Pemberi Maklumat dilindungi dan dirahsiakan.

Pendedahan tentang salah laku seperti penipuan, rasuah, penyelewengan kewangan yang serius dan salah guna kuasa yang telah dilakukan oleh seseorang yang dilantik oleh **TH** boleh dilakukan melalui salah satu saluran-saluran seperti berikut :-

#### Saluran

Saluran e-Whistleblowing adalah menerusi email:  
[e-whistleblowing@lth.gov.my](mailto:e-whistleblowing@lth.gov.my) atau secara bertulis dan bersemuka dengan hadir ke :

LEMBAGA TABUNG HAJI  
Menara TH Tun Razak  
201, Jalan Tun Razak  
50400 Kuala Lumpur  
(u.p. : Pengerusi Lembaga TH ATAU Pengerusi Jawatankuasa Audit dan Tadbir Urus TH)

## Proposed wording in TH PROP website

### Whistleblowing Policy

Please read and understand our Whistleblowing Procedure before submitting your disclosure.

#### Whistleblowing Policy

TH Prop has established a Whistleblowing Policy to address workplace misconduct, thus facilitating TH Prop members or the public to report violations of the code of conduct and/or integrity, in a structured manner and with the guarantee that the whistleblower's identity is protected and kept confidential.

Disclosure of misconduct such as fraud, corruption, serious financial misappropriation, and abuse of power committed by a person appointed by TH Prop can be done through one of the following channels:

#### Channels

The Whistleblowing channel is via:

- 1) email ([whistleblowing@th-properties.com](mailto:whistleblowing@th-properties.com))
- 2) in writing
- 3) face-to-face at the location below:

TH Properties Sdn. Bhd.  
Menara TH Selborn  
153, Jalan Tun Razak,  
50400 Kuala Lumpur  
(Attn.: Designation Officers and Audit Risk Management Committee)

## Current wording in TH website

Setelah membuat pendedahan secara jujur, berdasarkan sebab yang munasabah dan mengikut prosedur yang ditetapkan di bawah Dasar ini:

1. Pemberi Maklumat akan dilindungi daripada tindakan balas dalam **TH** yang berpunca secara langsung daripada pendedahan yang dilakukannya; dan
2. Identiti Pemberi Maklumat akan dilindungi, iaitu dirahsiakan melainkan dikehendaki oleh undang-undang atau untuk tujuan apa-apa prosiding yang dimulakan oleh **TH** atau terhadap **TH**.

Identiti dan maklumat peribadi Pemberi Maklumat dan orang yang dikatakan pesalah laku itu boleh didedahkan kepada orang yang terlibat dalam siasatan atau apa-apa proses lain atas dasar "perlu tahu".

### Apakah Perkara Yang Hendak Didedahkan

Sesuatu pendedahan ("Pendedahan") boleh dibuat jika ada kaitan dengan salah satu atau lebih daripada satu salah laku berikut yang dilakukan oleh mana-mana orang semasa menjalankan perniagaan atau urusan **TH** ("Salah Laku"):

1. Rasuah atau penipuan;
2. Kesalahan jenayah;
3. Penyalahgunaan dana atau aset **TH**;
4. Penyelewengan kewangan atau pelanggaran peraturan kewangan yang serius dalam **TH**;

## Proposed wording in TH PROP website

After making an honest disclosure, based on reasonable grounds and in accordance with the procedures outlined by this Policy:

1. The whistleblower will be protected from retaliation in TH Prop that directly results from the disclosure he made; and
2. The identity of the whistleblower will be protected, i.e. kept confidential unless required by law or for the purposes of any proceedings initiated by TH Prop or against TH Prop.

The identity and personal information of the whistleblower and the alleged offender may be disclosed to persons involved in the investigation or any other process on a "need-to-know" basis.

### Matters to be Disclosed

A disclosure ("Disclosure") can be made if there is a connection with one or more of the following misconducts committed by any person in the course of TH Prop's business or dealings ("Misconduct"):

1. Bribery or fraud;
2. Criminal offence;
3. Misappropriation of TH Prop's funds or assets;
4. Financial irregularities or serious violations of financial regulations in TH Prop;

## Current wording in TH website

5. Pelanggaran serius Kaedah-kaedah Am Lembaga Tabung Haji 1983, Surat-surat Pekeliling serta terma syarat lain bagi perkhidmatan yang dikeluarkan dari semasa ke semasa untuk Anggota dan Ahli Lembaga **TH**;
6. Sesuatu tindakan atau pengabaian yang menimbulkan bahaya yang cukup besar dan khusus terhadap nyawa, kesihatan atau keselamatan Anggota **TH** atau orang ramai atau alam sekitar;
7. Kegagalan mematuhi peruntukan Akta Tabung Haji 1995;
8. Kegagalan mematuhi peruntukan Akta Parlimen yang lain sekiranya pesalah laku dengan sengaja tidak mengendahkan atau tidak mematuhi peruntukan tersebut; atau
9. Dengan sengaja mengarahkan atau menasihati seseorang supaya melakukan mana-mana satu daripada Salah Laku yang tersebut di atas.

### Kandungan Pendedahan Maklumat

Maklumat yang hendak dilaporkan perlu mengandungi perkara berikut:

1. Nama Pesalah Laku;
2. Keterangan tentang insiden yang didakwa berlaku;
3. Waktu kejadian;
4. Tarikh kejadian;
5. Maklumat lain yang berkenaan;
6. Bukti sokongan(jika ada) ;

## Proposed wording in TH PROP website

5. Circular letters, and other terms and conditions for services issued from time to time for members and Board Members;
6. An act or omission that poses a substantial and specific danger to the life, health, or safety of TH Prop members or the public or the environment;
7. Serious mismanagement of TH Prop;
8. Failure to comply with the provisions of the policy if the offender deliberately ignores or does not comply with said policy; or
9. Intentionally directing or advising someone to commit any of the above misconduct.

### Content of Disclosure

The information to be reported must contain the following:

1. Name of Offender;
2. Evidence of the alleged incident;
3. Time of occurrence;
4. Date of occurrence;
5. Relevant additional information;
6. Supporting evidence (if any);

## Current wording in TH website

## Proposed wording in TH PROP website

### Surat Layang

Secara dasarnya **TH** tidak akan melayan sebarang pendedahan tanpa identiti Pemberi Maklumat. Walau bagaimanapun, pendedahan tersebut akan dipertimbangkan sekiranya kriteria berikut dipenuhi:

1. Pengadu ada menyertakan dokumen yang kukuh bagi membuktikan sabitan pendedahan tersebut;
2. Pendedahan tersebut adalah dibuat terhadap kepincangan atau kelemahan terhadap proses yang terlibat dan tidak menyerang mana-mana individu tertentu; atau
3. Pendedahan tersebut dibuat kerana ia mempunyai potensi kesan reputasi yang tinggi dan besar kepada organisasi **TH**.

### Perlindungan Pemberi Maklumat

Pemberi Maklumat akan diberi perlindungan di bawah Dasar ini jika pendedahan yang dibuat adalah benar dan jujur. Identiti Pemberi Maklumat akan dilindungi dan dirahsiakan.

Pemberi Maklumat perlulah mengemukakan identiti seperti di bawah:

1. Nama;
2. No. Kad Pengenalan; dan
3. No. Telefon untuk dihubungi-Pejabat/ Telefon Bimbit/ Rumah

Pemberi Maklumat akan dimaklumkan mengenai hasil pendedahan yang dilakukan.

### Surat Layang

In principle, TH Prop will not entertain any disclosure without the identity of the whistleblower. However, the disclosure will be considered if the following criteria are met:

1. The whistleblower has provided strong documents to prove the conviction of the disclosure;
2. The disclosure is made of defects or weaknesses in the process involved and does not attack any particular individual; or
3. The disclosure is made due to its potential significant and substantial impact on TH Prop organisation.

### Whistleblower Protection

Whistleblowers will be protected under this policy if the disclosure made is truthful and honest. The identity of the whistleblower will be safeguarded and kept confidential.

The whistleblower must provide the following details for identification:

1. Name;
2. Identification card number; and
3. Contact Number of Office/Mobile/Home

The whistleblower will be notified of the outcomes of the disclosure made.

## Current wording in TH website

## Proposed wording in TH PROP website

Perlindungan Pemberi Maklumat terbatal sekiranya:

1. Pemberi maklumat mengambil bahagian dalam perlakuan tidak wajar.
2. Pemberi maklumat dengan sengaja memberikan kenyataan palsu.
3. Pendedahan maklumat dilakukan dengan niat jahat.
4. Pendedahan maklumat adalah remeh dan menyusahkan.

#### Makluman Hasil Pendedahan

Pemberi Maklumat akan diberitahu tentang status kes pendedahannya seberapa yang boleh mengikut keperluan “Perlu Tahu”.

Daripada abu Sa'id al Khudri RA berkata, aku mendengar Nabi SAW bersabda:

مَنْ رَأَىٰ مُنْكِرًا فَلَيُغَيِّرْهُ بِيَدِهِ، فَإِنْ لَمْ يُسْتَطِعْ فَبِلْسَانِهِ، وَذَلِكَ أَضْعَافُ الْإِيمَانِ

Maksudnya: “Barangsiapa di antara kamu yang melihat kemungkaran, hendaklah dia mengubahnya dengan tangannya. Apabila dia tidak mampu, maka dengan lisannya. Dan apabila dia tidak mampu lagi, maka dengan hatinya. Sesungguhnya itu adalah selemah-lemah iman.”  
[Riwayat Muslim (78)]

Whistleblower protection is revoked if:

1. Whistleblower participates in improper conduct.
2. The whistleblower intentionally provides false statements.
3. The disclosure of information is made with malicious intent.
4. The disclosure of information is trivial and causes inconvenience.

#### Notification of Disclosure Results

The whistleblower will be notified of the status of his disclosure case as much as necessary, in accordance with the “need-to know” principle.



**THANK YOU**