

# **WHISTLE BLOWING POLICY**

## **INTRODUCTION**

The Board of Directors (the Board) is committed to achieving and maintaining the highest standard of work ethics in the conduct of business in line with the code of ethics & conduct and good corporate governance practices, the Company and its subsidiaries (the Group) encourage its employees to report suspected and/or known misconduct, wrongdoings, corruption and instances of fraud, waste, and/or abuse involving the resources of the Group.

## **OBJECTIVES**

The objective of the policy and procedure is to provide and facilitate a mechanism for any reporting individual to report concern about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse which may include the following examples of issues:

- Fraud
- Misappropriation of the Group's funds and assets
- Non-compliance with the Group's policies and procedures and/or code of conduct
- Misuse of confidential information
- Abuse of power and position
- Conflict of interest within the meaning of the Group's conflict of interest policy
- Commission of unlawful acts
- Exposure of Group's properties, facilities and/or staff to the risks of safety and security
- Failure to meet profession standard

## **POLICY AND PROTECTION**

### **a) Anonymity**

This policy allows the whistleblower to either identify himself/herself, or if the whistleblower wishes, to remain anonymous when reporting suspected improper conduct.

### **b) Confidentiality**

The whistleblower shall be accorded with protection of anonymity or confidentiality of identity, unless otherwise required by law. All reports or disclosures or such other details shall be kept confidential.

### **c) Assurance against reprisal or retaliation, immunity from disciplinary action**

This policy provides assurance that the whistleblower, if an employee of the Company, shall be protected against reprisals or retaliation, and immunity from disciplinary action from the whistleblower's immediate supervisor or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:-

- only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;

- the disclosure is not made with malicious intent or ill will;
- the disclosure is not frivolous or vexatious; and
- the report is not made for personal gain or agenda.

#### **PROCEDURE**

- a) Any concern should be reported to the immediate supervisor. However, if it is not possible or appropriate to do so, the concern should then be reported to the Group Managing Director.
- b) Any concern that deemed not appropriate to be reported to the immediate superior should be raised to the attention of the Executive Chairman.
- c) Upon receipt of the concern, the Group Managing Director or the Executive Chairman (depending on who is the recipient of the reporting) shall set up an investigating team to conduct investigation on the issue/concern raised.
- d) The progress of the investigation shall be reported to the Group Managing Director or the Executive Chairman.
- e) Upon completion of the investigation, the Investigators shall submit their full report together with recommendation to the Group Managing Director or the Executive Chairman.
- f) Actions mandated shall be carried out accordingly.
- g) If the whistleblower is not satisfied with the way the concern/matter is dealt with, he/she can escalate the report to the Audit Committee Chairman. The Audit Committee will deliberate the matter reported and decide on the appropriate action.