

WOODLANDOR HOLDINGS BERHAD GROUP

WHISTLEBLOWING POLICY

Purpose

This Whistleblowing Policy is intended to assist employees who believe they have discovered improper conduct within Woodlandor Group.

Where an employee discovers information which he / she believes shows improper conduct and is substantially true within Woodlandor Group then this information can be reported or disclosed internally without fear of reprisal so that the Company can conduct an investigation and resolve the complaint.

Scope

This Whistleblowing Policy applies to all employees (permanent, contract and part-time) of the Company and all its subsidiary companies.

Improper conduct is defined under the Whistleblower Protection Act 2010 as meaning any conduct which if proved, constitutes a disciplinary offence or a criminal offence.

Improper conduct includes, inter alia, the following :-

- Fraud, corruption or bribery
- Criminal activity
- Breach of confidentiality
- Breach of any law or regulatory obligation
- Breach of Woodlandor Group's policies, procedures and rules
- Misuse of Woodlandor Group's information
- Misappropriation or theft of funds, software, data or other assets
- Falsifying payroll records, overtime claims, travel expenses and entertainment expenses among others
- Forgery or alteration of any document (including cheques and other financial instruments)
- Malpractice or impropriety in matters of financial and operational reporting
- Fictitious reporting of receipts, delivery orders, etc from suppliers or shipment to customers
- Act of conflict of interest with suppliers, customers or contractors
- Action which poses danger to health, safety or the environment
- Attempts to conceal any of the above improper conducts

Safeguards

- **Protection**

This Whistleblowing Policy is designed to offer protection to employees who disclose such improper conduct provided the disclosure is made in good faith.

An employee who in good faith discloses an improper conduct will be protected from any reprisal (disciplinary action, harassment, retaliation, demotion, suspension or termination of employment or service) within Woodlandor Group as a direct consequence of the disclosure. Any such employee who believes he / she is being retaliated against must contact the Head of the Human Resources Department immediately. An employee who retaliates against another employee who has reported an improper conduct in good faith is subject to discipline action including termination of employment.

- **Untrue Allegations**

An employee filing a complaint concerning an improper conduct must act in good faith, exercise due care to ensure the accuracy of the information and has reasonable grounds for believing the information disclosed to be true.

If an employee makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against the employee, If, however, an employee makes malicious allegation or discloses information which is knowingly to be false, disciplinary action may be taken against that employee.

- **Confidentiality**

The Company will treat all disclosures in a confidential and sensitive manner. Every effort will be made to keep the identity of the employee making the allegation confidential to the extent possible however, the identity may have to be disclosed to conduct a thorough investigation, to comply with the law. The Company gives the assurance that it will not reveal the identity of the employee to any party not involved in the investigation.

Procedures and Action

- 1) The complaint should be submitted in a sealed envelope to the Executive Director who will nominate an appropriate investigator who is impartial and independent of all parties concerned promptly.

Alternatively, the complainant may approach his / her immediate superior who is in the best position to address an area of concern. However, if the complainant is not comfortable speaking to his / her immediate superior, the complainant is encouraged to speak to the Head of the Human Resources Department.

The immediate superior or Head of Human Resources Department must then assist the complainant to submit a written complaint to the Executive Director, who will nominate an appropriate investigator who is impartial and independent of all parties concerned promptly.

- 2) The investigator should take the following steps :
 - a) Obtain full details and clarifications of the complaint.
 - b) The investigator should inform the accused individual as soon as is practically possible on the complaint.
 - c) The allegation should be fully investigated by the investigator speedily with the assistance of other individuals in the Group, if necessary.
 - d) The investigator will report his investigation findings and present any evidences to the Executive Director.
 - e) The Executive Director will make a judgement and decide on the disciplinary action.
 - f) The Head of Human Resources Department will inform the complainant about the outcome of the investigation and is responsible for executing the disciplinary action immediately.
 - g) If there is evidence of criminal activity, then the Company should report to the police.
 - h) Measures / steps will be implemented to prevent similar situation arising.

Further Action

If the complainant is not satisfied with the way that his / her complaint had been dealt with, he / she can raise it with the Executive Chairman.

The Executive Chairman will deliberate the investigation report with the Board and decide on the action.

Review

The Board of Directors of the Company will modify this Whistleblowing Policy if necessary, to maintain compliance with laws and regulations and accommodate organisation changes within Woodlandor Group among others. Modifications shall be communicated to all Officers.

This Whistleblowing Policy was updated and approved by the Board of Directors on 5 April 2018.