

**BCB BERHAD**  
**[Registration No. 198801004645 (172003-W)]**

**WHISTLEBLOWING POLICY**

**1. Objective**

BCB Berhad (“the Company”) is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, this policy aims to provide an avenue for all employees of the Company and its subsidiaries (“the Group”) to raise concerns and to provide reassurance that they will be protected from reprisal or victimization for whistle blowing.

**2. Policy and Protection**

This policy is designed to facilitate any internal or external person, including members of the public, to report or disclose through established channels, concerns about any actual, suspected or attempted unethical behavior, malpractices, illegal acts including bribery or corruption, failure to comply with regulatory requirements or of BCB’s policies and procedures that is taking place/ has taken place/ may take place in the future. Persons are also able to report any violation or weaknesses in BCB’s internal controls.

a) Anonymity

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately but consideration will be given to:

- i) the seriousness of the issue raised;
- ii) the credibility of the concern; and
- iii) the likelihood of confirming the allegation from attributable sources.

b) Confidentiality

The Company shall treat all reports or disclosures as sensitive and will only reveal information on a “need to know” basis or if required by law, court or authority. The identity and particulars of the whistle blower shall also be kept private and confidential.

The whistleblower’s particulars and their report shall be kept in a secure information management system.

c) Protection

This policy provides assurance that the whistle blower will not be at risk of losing job or suffer from any form of retaliation, retribution or harassment provided that the disclosure is made in good faith or on the basis of reasonable belief, even if the investigation later reveals that the whistleblower is mistaken as to the facts and rules or procedures involved. This policy does not, however extend to anyone who willfully or maliciously raises a concern, knowingly or believing the information provided is false or untrue.

### 3. Procedures

Any concern should be raised with the immediate superior or the compliance function of BCB. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Chairman of the Board.

Name: **Dato' Ismail Bin Karim**

Email: [ismailkarim@bcbbhd.com.my](mailto:ismailkarim@bcbbhd.com.my)

Mail: Marked Strictly Confidential  
c/o BCB Berhad  
No. 4B, 2<sup>nd</sup> & 3<sup>rd</sup> Floor  
Jalan Sentol, South Wing – Kluang Parade  
86000 Kluang, Johor  
Attention: The Chairman

In the case where reporting to management is a concern, then the report should be made to the Chairperson of Audit Committee:-

Name: **Ms Law Lee Yen**

Email: [leeyenlaw@bcbbhd.com.my](mailto:leeyenlaw@bcbbhd.com.my)

Mail: Marked Strictly Confidential  
c/o BCB Berhad  
No. 4B, 2<sup>nd</sup> & 3<sup>rd</sup> Floor  
Jalan Sentol, South Wing – Kluang Parade  
86000 Kluang, Johor  
Attention: Chairperson of the Audit Committee

### 4. Action

- a) All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group. The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- b) Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decisions made by the Audit Committee will be implemented immediately.
- c) Where possible, steps will also be implemented to prevent such situation from recurring.

If for any reason, the person making the report is not satisfied with the way his report had been dealt with, he can escalate his report to the Chairperson of Audit Committee:-

Name: **Ms Law Lee Yen**  
Email: [leeyenlaw@bcbhd.com.my](mailto:leeyenlaw@bcbhd.com.my)

Mail: Marked Strictly Confidential  
c/o BCB Berhad  
No. 4B, 2<sup>nd</sup> & 3<sup>rd</sup> Floor  
Jalan Sentol, South Wing – Kluang Parade  
86000 Kluang, Johor  
Attention: Chairperson of the Audit Committee

Chairperson of Audit Committee will deliberate the report with his committee members and decide on the appropriate course of action.

This Policy was reviewed and approved by the Board of Directors on the following dates:

Version 1	29 Nov 2018
Version 2	29 May 2020
Version 3	24 Nov 2021
Version 4	11 Oct 2022