



## WHISTLE-BLOWER POLICY AND PROCEDURES

Benalec Holdings Bhd and all its affiliates and subsidiaries (“Benalec”), requires all the employees including the directors, heads of department, managers, and officers (collectively known as “the Employees”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Benalec, it is incumbent upon them to practise honesty and integrity in fulfilling their responsibilities and complying with all applicable laws and regulations.

### **1) Reporting Responsibility**

This whistle-blower policy and procedures are intended to encourage and enable the Employees and others to raise serious concerns so that Benalec can address and correct inappropriate conduct and actions. It is the responsibility of all board members, heads of department (“HOD’s”) and employees to report concerns about illegal activities, violations of Benalec’s code of ethics, incidents of bribery/ corruption or suspected violations of any laws or regulations that govern Benalec operations.

All customers, suppliers, contractors or third parties are also encouraged to raise genuine concerns about possible improprieties and other malpractices including bribery/ corruption incidents at the earliest opportunity.

### **2) No Retaliation**

It is contrary to the values of Benalec for anyone to retaliate against any board members, , Employees or third parties who in good faith reports an ethics violation, bribery/ corruption or suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Benalec. An employee who retaliates against someone who has reported a violation in good faith against him is subject to discipline up to and including summary termination of employment.

### **3) Reporting Procedure**

Benalec has an open-door policy and suggests that an employee may share their questions, concerns, suggestions or complaints with their **HOD’s**. If the employee is not comfortable speaking with his/her HOD, or is not satisfied with the HOD’s response, he/she is encouraged to speak, and to submit the subject concerns in writing, to the **Compliance Officer** and/or **the Directors**. HODs and/or the Directors are required to report complaints or concerns about suspected ethical, bribery/ corruption and legal violations in writing to the **Compliance Officer** or **Audit Committee** which has the responsibility to investigate all reported complaints.



If any customer, supplier, contractor or third party believes reasonably and in good faith that malpractices including bribery/ corruption exists, they can report the concerns to either the:

- Chairman of the Board; or
- Audit Committee Chairman.

The contact details of the Chairman of the Board and Audit Committee Chairman where concerns can be raised are as follow:

<b>Chairman of the Board</b>	<b>Audit Committee Chairman</b>
Email: <a href="mailto:nyen@wyncorp.com.my">nyen@wyncorp.com.my</a>	Email: <a href="mailto:bernard.koo@gmail.com">bernard.koo@gmail.com</a>

In respect of reporting bribery/ corruption incidents, please complete the Incident Reporting Form found in Appendix II(A) of this Policy.

**4) Compliance Officer**

The Compliance Officer is responsible for ensuring that all complaints are investigated and resolved. The Compliance Officer will immediately advise the Board of Directors of all complaints and their resolution.

**5) Accounting and Auditing Matters**

The Compliance Officer shall immediately notify the Audit Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

**6) Acting in Good Faith**

Anyone filing a written complaint concerning a violation must act in good faith and has reasonable grounds for believing the information disclosed indicates a violation. Any allegation that is proven not to be substantiated and which proves to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**7) Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Report of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.



**8) Handling of Reported Violation**

The Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Any queries regarding this policy by the Employees/ any third party may be directed to the Human Resource Department and/or the Compliance Officer.