

PROTASCO BERHAD **Whistleblowing Policy**

Policy Statement

Protasco Berhad expects high standard of integrity from all employees. It takes a serious view of any misconduct or wrongdoing of its employees with respect to their obligations for the Group's interests. This Whistleblowing policy is established to help employees and other stakeholders to raise their concerns without fear of retaliation on any known and/or suspected misconduct, wrongdoings, corruption, fraud or any other acts as illustrated below.

This Policy is to be read together with the other Group's policies and other internal, statutory or regulatory reporting procedures.

Objectives

This policy is established with the following objectives:

- 1) To enable the employees to raise any concerns of integrity and misconduct in timely and systematic manner;
- 2) To protect the employees from reprisal or unfair treatment for disclosing concerns in good faith in accordance with the Policy;
- 3) To develop a culture of accountability, integrity and good governance practices within the Company.

Scope of Policy

This Policy applies to any Improper Conduct involving employee within the Group that impacts the Group of companies, its employees, or other stakeholders.

Types of Improper Conduct

The act of improper conduct or misconduct including, but not limited to the following:

- a. Suspected criminal offence or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail; Forgery or alteration of any document or account belonging to companies within the Group.
- b. Criminal offence or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail; Forgery or alteration of any document or account belonging to companies within the Group

- c. Non-compliance with Regulatory Requirements and internal procedures; improprieties of tender and procurement activities
- d. Financial / professional misconduct such as forgery or alteration of a cheque, bank draft, or any other financial document; Misappropriation of Group's funds, securities, supplies, or other assets; Impropriety in the handling or reporting of money or financial transactions; Profiteering as a result of insider knowledge of the Group's activities.
- e. Sexual harassment, injury or damages to the staffs or the Company's properties
- f. Abuse of position or company's asset for personal gain or interest
- g. Involvement in conflict of interest transactions without appropriate disclosure
- h. Any conduct which is an offence or a breach of law; receiving / soliciting graft / kickbacks; poses danger to health and safety; act that causes damage to environment
- i. Concealment of any of the above

Confidentiality and Protection

The identity of the whistle blower will be kept confidential. Complete protection will be given to whistle blower against any reprisal, threat or intimidation including any action to obstruct the whistle blower's rights to continue performing his duties including making further disclosure. Any party that retaliates against the whistle blower may be subject to disciplinary action. Further to that, the whistle blower is protected under the *Malaysian Whistleblowing Protection Act 2010*.

Acting in good faith

The Company expects all parties to act in good faith and have reasonable grounds when reporting the wrongdoings. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

Reverting to complainant

The Company reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owned to someone else.

Content of Disclosure

Any disclosure made by the whistleblower should contain the following information:

1. WHO – details of the person(s) involved
2. WHAT – the alleged misconduct / wrongdoing
3. WHEN – when the alleged misconduct / wrongdoing took place

4. WHERE – where is the alleged misconduct/wrongdoing took place
5. HOW – Nature of allegation / details of allegation

To whom should disclosures be made

For all disclosure of Improper Conduct, the following channels may be used:

- 1) Via electronic e-mail to whistleblow@protasco.com.my
- 2) In writing to:

The Chairman of Audit Committee
Protasco Berhad
2nd Floor, Corporate Block
Unipark Suria, Jalan Ikram-Uniten
43000 Kajang, Selangor.