

CLASSIC SCENIC BERHAD
(Company No. 633887-M)

WHISTLEBLOWING POLICY AND PROCEDURE

1. Objective & Scope

Classic Scenic Berhad (“the Company”) and its subsidiaries (collectively known as “the Group”) are committed to conduct the Group’s business with the highest level of corporate ethics and embedded culture of transparency and accountability in day-to-day business operations.

This policy provides an avenue for all employees of the Group and business associates to report any genuine concerns in accordance with the procedures as provided for under this policy and to provide protection for the whistleblower(s) who report such allegations.

It is designed to facilitate employees and business associates to report any genuine concern or malpractices (hereinafter referred to as “Concerns”) through the Company’s provided channel. Such concerns or criminal offences include (but not limited to) the following:

- i. Actual / suspected fraud;
- ii. Any form of corruption activities;
- iii. Abuse of power;
- iv. Conflict of interest;
- v. Theft or embezzlement;
- vi. Misuse of Company’s property; and
- vii. Non-compliance with Policies & Procedures.

2. Confidentiality and Anonymity

Every effort will be made to treat the Whistleblower’s identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the Whistleblower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to when the Group is obligated to reveal confidential information relating to a whistle-blowing report if ordered to do so by law or for purposes of any proceedings by or against the Group. The Group’s assurance of confidentiality can only be completely effective if the Whistleblower likewise maintains confidentiality.

3. Protection

The Whistleblowing Policy offers protection within limits of the law and to the extent reasonably practicable to whistleblower(s) who submit the reports internally in good faith, even if the allegations prove to be unfounded or mistaken. In addition, a whistleblower will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the organisation, to the extent reasonably practicable, provided that the disclosure is made in good faith.

4. Reporting in Good Faith

Reporting in good faith includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he / she is being retaliated against must contact the Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

5. Anonymous Allegations

Although the Company is not expected to address any anonymous allegations, the Company may, however, consider conducting an inquiry of an anonymous allegation after having considered the following:

- i. the seriousness of the concern;
- ii. the credibility of the concern; and
- iii. the likelihood of confirming the concern from credible sources.

6. Procedures

6.1 Process for Disclosure

i. **Impropriety**

This policy covers improprieties or irregularities, suspected fraud or criminal offences, breach of confidentiality and failure to comply with legal or regulatory requirements.

ii. **Reporting**

Any concerns shall be reported to the following channels as stated below, whistleblower may use *Whistleblower Report Form* appended as guide for information:

- a) Email to:

| No. | Designation | Email |
|-----|-----------------------------|--|
| 1 | Chairman of Audit Committee | lew.chongkiat@gmail.com |
| 2 | Managing Director | samuel.lim@classicscenic.com |

- b) Letters / documents / reports (in sealed envelope with labelled “STRICTLY PRIVATE AND CONFIDENTIAL TO BE OPENED BY THE ADDRESSEE ONLY” to be addressed to:

CHAIRMAN OF AUDIT COMMITTEE

CLASSIC SCENIC BERHAD

Lot 12, Jalan RP3,
Taman Rawang Perdana,
48000 Rawang, Selangor D.E.

If the whistleblower, either from an internal or external source makes a report through a third party, i.e., Senior Management who may be the Executive Chairman, Executive Director, Chief Financial Officer, Senior Managers or any other employee, then it is the responsibility of the third party to escalate the report to the right channel as mentioned in (a) and (b) above.

iii. Handling of a reported allegation

All reports of misconduct, findings of investigations and monitoring and corrective actions shall be centralised and logged in a log administered and monitored by the Company's Company Secretary. The Board shall be informed of any new reports of misconduct and may request to review the log at any time.

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

6.2 Investigator

Upon receiving a "Concern" from the Whistleblower, the Chairman of Audit Committee shall initiate an internal investigation within the organization. Thereafter, the Chairman of Audit Committee may further request the Internal Auditors or/and external professionals to perform a comprehensive investigation on the Concern, if necessary.

The "investigator" is required to report all Concerns raised, the status of all pending and on-going investigations, and any actions taken or to be taken as a result of the investigations, to the Chairman of Audit Committee.

6.3 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

If an investigation leads the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group's Code of Business Conducts and Ethics, the results of the investigation shall be reported to the above-mentioned parties accordingly for the next course of action by the relevant party. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

7. Policy Matters

This Policy shall be published at the Company's website and made available for all internal and external stakeholders.

8. Monitoring and Periodic Review of Policy

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group; and, if necessary, implement changes subject to the approval of the Company's Board of Directors.

This policy will be reviewed periodically and may be amended as it deems appropriate to ensure its relevance and effectiveness.

CLASSIC SCENIC BERHAD WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistleblowing Policy and Procedure.

| Reporter's Contact Information | | |
|------------------------------------|--|--|
| Name | | |
| I/C No. / Passport No. / Staff No. | | |
| Correspondence Address | | |
| Telephone No. | Home | |
| | Office | |
| | Mobile | |
| E-mail Address | | |
| Designation / Occupation | | |
| Division / Section / Unit / Branch | | |
| Preferred method of communication | <input type="checkbox"/> Mail <input type="checkbox"/> E-mail <input type="checkbox"/> Telephone / SMS | |

| Suspect's Information | | | |
|------------------------------------|--|---------------|--|
| Individual 1 | | | |
| Name | | | |
| Designation | | | |
| Division / Section / Unit / Branch | | | |
| Contact Number | | Email Address | |
| How do you know this employee? | | | |
| Individual 2 | | | |
| Name | | | |
| Designation | | | |
| Division / Section / Unit / Branch | | | |
| Contact Number | | Email Address | |
| How do you know this employee? | | | |
| Individual 3 | | | |
| Name | | | |
| Designation | | | |
| Division / Section / Unit / Branch | | | |
| Contact Number | | Email Address | |
| How do you know this employee? | | | |

| Details of the misconduct | | |
|---|--------------------------|----|
| COMPLAINT: Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary. | | |
| What misconduct / improper activity occurred? | | |
| Who committed the misconduct / improper activity? | | |
| When the misconduct / improper activity occurs? And since when did you notice it? | | |
| Where did the misconduct / improper activity happen? | | |
| Is there any evidence that you could provide to us? | | |
| Do you have any other details or information which would assist us in the investigation? | | |
| If money is involved, can you estimate the amount of money involved? | Yes | No |
| If YES, please indicate the estimated amount of money involved (cross X where applicable): | | |
| Less than RM500 | <input type="checkbox"/> | |
| RM501 to RM10,000 | <input type="checkbox"/> | |
| RM10,001 to RM50,000 | <input type="checkbox"/> | |
| More than RM50,001 | <input type="checkbox"/> | |
| Have you lodged a complaint on this matter to another person / department / authority before? | Yes | No |
| If YES, please indicate the person / department / authority that the report was lodged (cross X where applicable and attach copy of the report made): | | |
| Police | <input type="checkbox"/> | |
| Malaysian Anti-Corruption Commission | <input type="checkbox"/> | |
| Others, please indicate: | <input type="checkbox"/> | |
| Date when the Report was made | | |
| Status of report made | | |
| Declaration | | |

I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.

I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.

| | |
|-----------|--|
| Signature | |
| Name | |
| Date | |

For office use only

| | |
|--|-------------------------------------|
| Record No. | |
| Receipt Information | Person receiving this report: |
| | Date Received: |
| | Acknowledgement of receipt sent on: |
| Investigation required (YES / No)? (If No please state the reason) | |
| Investigation Done By: | |
| Investigation Result: | |
| Action Taken / Conclusion: | |
| Reported to the Board on: | |
| Signed off by: | |