



SWS CAPITAL BERHAD

WHISTLE BLOWING POLICY AND PROCEDURES

1. Policy Statement

- a. SWS Capital Berhad is committed to achieving and maintaining high standards with regards to behavior at work as set out in SWSCAP's 'Principles of Business'
- b. In order to achieve the standards set in the SWSCAP's Principles of Business, all employees and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.
- c. SWSCAP views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.
- d. The policy and procedures is applicable to all companies within SWSCAP Group.

2. Whistle Blowing

- a. Whistle Blowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.
- b. Only genuine concerns should be reported under Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

3. Procedures

- a. Any concern should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to Group Managing Director. Channel of reporting to Group MD are:

Name : Dato' Chua Heok Wee
Telephone : +606 9865 236
Mail : **Mark Strictly Confidential**
SWS Capital Berhad
PTD6001, Jalan Perindustrian 5, Batu 8,
Kawasan Perindustrian Bukit Bakri,
84200 Muar, Johor, Malaysia.
Attention: Managing Director

- b. In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name : Ong Peng Teng
Telephone : +606 9865 236
Mail : *Mark* **Strictly Confidential**
SWS Capital Berhad
PTD6001, Jalan Perindustrian 5, Batu 8,
Kawasan Perindustrian Bukit Bakri,
84200 Muar, Johor, Malaysia.
Attention: Audit Committee Chairman

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 (e.g. Group Internal Audit, Group Human Resource Department, and Group Legal Department etc.). The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- b. Reports received anonymously will be treated as confidential.
- c. The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as it's permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
- d. Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
- e. Where possible, steps will also be implemented to prevent similar situation arising.

5. Further action

- a. 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 Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name : Ong Peng Teng
Telephone : +606 9865 236
Mail : *Mark* **Strictly Confidential**
SWS Capital Berhad
PTD6001, Jalan Perindustrian 5, Batu 8,
Kawasan Perindustrian Bukit Bakri,
84200 Muar, Johor, Malaysia.
Attention: Audit Committee Chairman

- b. Chairman of Audit Committee will deliberate the report with his Committee members and decide on the appropriate course of action.