



GADANG HOLDINGS BERHAD

(278114-K)

WHISTLE BLOWING POLICY & PROCEDURE

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1. PURPOSE

- a) Gadang is committed to achieving and maintaining the highest standards of openness, probity and accountability. Employees at all levels are expected to conduct themselves with integrity, impartiality and honest.
- b) Whistle Blowing is a specific means by which an individual, whether employee or otherwise (hereinafter referred to as the Reporting Individual), 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.
- c) The term ‘whistle blowing’ refers to a situation where the Reporting Individual decides to report serious concerns about any malpractice which he/she has become aware or genuinely suspects that Gadang has been or may become involved in. This policy is designed to encourage the Reporting Individual to raise serious concerns internally, without fear of reprisal or victimization, in a responsible and effective manner rather than overlooking a problem or blowing the whistle outside.
- d) This policy and procedures is applicable to all employees within the Gadang Group.

2. POLICY

- a) This policy is intended to assist the Reporting Individual to disclose internally and at a high level, information which the Reporting Individual believes shows malpractice or impropriety. It is not designed to further any personal disputes, question financial or business decisions taken by Gadang nor should it be used to reconsider any staff matters which have been addressed under the grievances procedure already in place. Whistle blowing matters may include but are not confined to:-
 - Breach of legal or regulatory requirements
 - Criminal offences, breach of civil law and miscarriage of justice
 - Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters

- Endangerment of the health and safety of an individual
 - Damage caused to the environment
 - Violation of rules of conducts applicable within Gadang
 - Improper conduct or unethical behavior likely to prejudice the standing of Gadang
 - Deliberate concealment of any of the above
- b) Only genuine concerns should be reported. 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 (where the Reporting Individual is an employee) and if proven, may lead to dismissal.

3. PROCEDURE

Reporting Channel

- a) Any concern should be raised with the immediate superior. The immediate superior should then raise the matter with the management as appropriate i.e. Head of Division or Group Chief Financial Official (Group CFO) or Group Managing Director / Chief Executive Officer (Group MD/ CEO). If the concern involves the immediate superior, then the concern should be reported to the Group CFO or the Group MD / CEO. Channels of reporting to the Group CFO and Group MD / CEO are as follows:

Name: Kok Pei Ling

Email : kokpl@gadang.com.my

Telephone : 603-6279 6228

Gadang Holdings Berhad

Wisma Gadang

No 52, Jalan Tago 2 Off Jalan Persiaran Utama

Sri Damansara, 52200 Kuala Lumpur

Attention: Group CFO

Name : Tan Sri Dato' Kok Onn
Email : groupceo@gadang.com.my
Telephone : +603 6279 6388

Gadang Holdings Berhad
Wisma Gadang
No 52, Jalan Tago 2 Off Jalan Persiaran Utama
Sri Damansara, 52200 Kuala Lumpur
Attention: Group MD / CEO

- The Group MD / CEO may designate an appropriate person or set up an inquiry to investigate the matter.
- It for any reason the employee would prefer not to raise the malpractice concern with the immediate superior, the Group CFO or the Group MD/ CEO, the employee may take the complaint direct to the Senior Independent Non-Executive Director.

b) Channels of reporting to the Senior Independent Non-Executive Director are as follows:

Name : Mr Boey Tak Kong
e-mail : tkboey22@gmail.com
Telephone : +6012 – 657 5641

Gadang Holdings Berhad
Wisma Gadang
No 52, Jalan Tago 2 Off Jalan Persiaran Utama
Sri Damansara, 52200 Kuala Lumpur
Attention : Senior Independent Non-Executive Director

- i) The Senior Independent Non-Executive Director will deliberate the concern with the Board and decide on the appropriate course of action.

c) Reporting Form

A whistle blowing form is included in **Appendix 1**. Please refer.

4. INVESTIGATION PROCEDURE

- a) The format and the length of an investigation will vary depending upon the

nature and particular circumstances of each complaint made. The matters raised may:-

- be investigated internally;
 - be referred to the Police;
 - be referred to the External Auditor; and/or
 - form the subject of an independent inquiry.
- b) The Group CFO, Group MD / CEO, the Senior Independent Non-Executive Director or the person designated to investigate the complaint will write to the Reporting Individual wherever reasonably practicable of the concern being received, for the following purposes:-
- acknowledging that the concern has been received;
 - advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be;
 - giving an estimate of how long the investigation will take to provide a final response; telling the Reporting Individual whether any initial enquiries have been made, and whether further investigations will take place, and if not, why not.

5. PROTECTION & CONFIDENTIALITY

- a) It is Gadang's policy that the Reporting Individual should not suffer any form of intimidation, reprisal, retaliation or adverse reaction organizationally as a consequence of reporting a concern about any of the matters mentioned in paragraph 2(a).
- b) Gadang will make every effort to treat all disclosures in a confidential and sensitive manner.
- c) The identity of the Reporting Individual making the allegation will not be divulged without his / her consent. However, there may be circumstances in which Gadang may be required or legally obliged to reveal the Reporting Individual's identity, for example, where an investigation leads to legal proceedings being initiated. If this is the case, Gadang will take all reasonable steps to ensure that the Reporting Individual suffers no detriment. Harassment or victimization of a genuine whistle blower will not be tolerated.

6. UNTRUE ALLEGATIONS

In making a disclosure, the Reporting Individual should exercise due care to ensure the accuracy of the information. Where the Reporting Individual is an employee and he/she is mistaken, he/she will not be at risk of losing his/her job or suffer any form of retribution as a result, provided that he/she is acting in good faith. On the other hand, disciplinary action will be taken against employee deliberately raising false and malicious allegations. In an extreme case vexatious or wild allegations could give rise to legal action on the part of the persons complained about.

7. ACKNOWLEDGEMENT & RECOGNITION

Gadang places great value upon creating an environment where employees would maintain the highest standard of ethics, honesty, openness and accountability. Gadang recognizes that it requires courage and personal quality such as righteousness, loyalty and impeccable integrity for an employee to step out and blow the whistle. These personal qualities and positive behaviours demonstrated by the whistleblowers are well acknowledged by Gadang and will be taken into consideration, among others, for the employee's career opportunities and advancement.

For whistleblowers who are non-employees, Gadang also records its sincere appreciation for taking the effort to raise the concern so that the management may take actions as appropriate.