

WHISTLEBLOWING POLICY

1. Purpose

To ensure business and operations are conducted in an ethical, moral and legal manner.

2. Scope

Applies to all employees including migrant, student, outsourced, contract, and any other type of employees work in EMPG Group Berhad.

3. Reference

- 3.1 Code of Conduct
- 3.2 Sexual Harassment Policy

4. Definition

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| 4.1 The Company | : | All entities under EMPG Group Berhad |
| 4.2 Chairperson of ARMC | : | Chairperson of Audit and Risk Management Committee |
| 4.3 HR | : | Department of Human Resources |
| 4.4 IVT | : | Investigation Team |

5. Record

Not Applicable

6. Details

- 6.1 This procedure strictly prohibits frivolous, vexatious, false disclosure for personal gain or with personal agenda. This is also not a channel for taking up any personal grievances.
- 6.2 This policy does not cover concerns or complaints about employees' personal employment position.
- 6.3 The Company will take all reasonable steps to protect the whistleblower against any discrimination, retaliation, or harassment.
- 6.4 The Company will take seriously on any false, malicious, or defamatory allegation, and this can be considered as gross misconduct where appropriate disciplinary actions may be taken by the Company.
- 6.5 Scope of Reporting
 - 6.1.1 This policy coverage includes any improper conduct which may constitute or warrant a disciplinary offense or any conduct that constitutes a wrongdoing or misconduct/malpractice which may include but not limited to the followings:
 - Fraud or Dishonesty
 - Breaches of Policies, Procedures and applicable Laws and Regulations
 - Bribery
 - Corruption

- Conflict of Interest
- Theft
- Embezzlement
- Insider Trading
- Discrimination
- Harassment
- Bullying
- Abuse of Position
- Misuse of Confidential Information

6.6 Confidentiality and Protection

6.2.1 Whistleblower must identify himself / herself when raising concern. Upon making the disclosure in good faith:

- (a) The whistleblower will be protected from any reprisal within the Company (“reprisal” means disciplinary measure, demotion, suspension or termination).
- (b) The whistleblower’s identity shall be protected / kept confidential unless otherwise required by law or for the purpose of any proceeding by or against the Company.

6.2.2 Protection accorded by the Company only when the whistleblower satisfies all the following conditions:

- The disclosure is done in good faith;
- The whistleblower is aware that the information and any allegations disclosed are true;
- The whistleblower has not communicated the disclosure to any other party not related to the disclosure; and
- The disclosure made is not for personal gain or interest.

6.7 Reporting Procedure

6.7.1 Whistleblower may raise concern through any of the followings methods:

- (a) Send email to whistleblowing@empgggroup.com; or
- (b) Submit formal letter in sealed envelope with a “Strictly Confidential” legend to the following:

Chairperson of ARMC
Human Resources Department
1008, Jalan Makmur 2/7,
Taman Perindustrian Makmur,
09600 Lunas, Kedah.

Note: It is important that a team member feels able to report concern without fear of reprisal. Therefore, claims of victimization in such situations will be taken very seriously and disciplinary action taken against any personnel found guilty of such behavior.

6.7.2 Where the concern is received by the Chairperson of ARMC / HR, the recipient of such concerns shall be required to take investigation actions.

Note: If the concerns affect the Chairperson of ARMC, such concern shall be directed to BOD.

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- 6.7.3 Receiver shall pass the concerns to IVT for the need to conduct an adequate investigation. The investigation involves the BOD / Chairperson of ARMC / IVT / whistleblower where required.

Note: IVT will be appointed by the Chairperson of ARMC / BOD.

- 6.7.4 Once the matter has been investigated by IVT, the finding report will be provided to the whistleblower and HR who will take appropriate actions.

Note: Anyone found to have made a malicious allegation may be dismissed without notice or pay in lieu of notice.

- 6.7.5 IVT shall file the record as follows:

- (i) Those that fall into the scope of this policy but do not result in disciplinary or judicial proceedings will not be kept more than 2 months after the investigation is closed.
- (ii) Those that resulted in disciplinary or judicial proceedings will be kept until the termination of the proceedings.
- (iii) Those that do not fall into the scope of this policy will be shortly destroyed.