

JISHAN BERHAD

201901013612 (1322940-P)

WHISTLEBLOWING POLICY

1. POLICY STATEMENT

Jishan Berhad (“**JISHAN**”) and its subsidiaries (collectively referred to as the “Group”) committed to the highest standards of honesty, integrity, accountability and ethical behaviour in the conduct of its operations and services. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

With regards to the values mentioned above, the Whistleblowing Policy (“**Policy**”) has been formulated to enable the employees of the Group to report instances of unethical behaviour, improper conduct, actual or suspected fraud and/or abuse within the Company.

The implementation of the Policy is in line with the Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009, Capital Market and Services Act 2015, Personal Data Protection Act 2010 and all applicable laws and regulations in Malaysia.

2. OBJECTIVES

This Policy is to provide an avenue for all employees of the Group, third parties employed or engaged by the Group, employees of third parties employed or engaged by the Group and members of the public (collectively referred to as the “**Stakeholders**”) to disclose any improper conduct or unethical behaviour, actual or suspected fraud and/or abuse in accordance with the procedures as provided for under this Policy and to provide protection for those who report such allegations.

This Policy aims to develop a culture of honesty, total integrity and accountability.

It is to enable the management to be informed at an early stage to take corrective action and mitigate any potential damages; be it the reputation or the financial position of the Group.

It aims to reassure employees and directors that they would be fully protected from harassment or victimization for whistle blowing in good faith.

3. SCOPE

This Policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channels. Such misconduct or criminal offences include the following:

- a) Fraud;
- b) Bribery;
- c) Abuse of Power;
- d) Conflict of Interest;
- e) Theft or Embezzlement;
- f) Misuse of Company Property; and/or
- g) Non-Compliance with Procedure

The above list is not exhaustive and includes any actor omissions, which if proven, will constitute an act of misconduct under JISHAN's Code of Ethics and Conduct or any criminal offence under relevant legislations in force.

This Policy is not to invalidate the Grievance Procedure and/or the Disciplinary Action Process and Procedure but to provide alternative avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Group. The given procedures as reflected in the Code of Ethics and Conduct shall be operative based on the purpose and objective of their existence.

4. DEFINITIONS

a) **Whistleblower**

The Stakeholder who discloses or reports the wrongdoing.

b) **Whistleblowing**

This occurs when the stakeholder raises a genuine concern about a dangerous or illegal activity or improper conduct that he / she is aware of through his / her work / dealing.

5. ELIGIBILITY

Members of the public, all employees, directors, shareholders, consultants, vendors, contractors or any parties involved in a business relationship with the Group are encouraged to disclose any wrongdoing that may adversely impact the Group. The Protected Disclosures may be in relation to matters concerning the Group.

A Whistleblower will be accorded with the protection of confidentiality of identity, to the extent reasonably practicable. The Group is committed to this Policy and assures that the Whistleblower will not suffer any form of retribution, victimisation or detriment.

If the Whistleblower could prove that they have been subjected to retribution, victimisation, or detriment because of using this policy, disciplinary action will be taken against the perpetrator.

6. DISQUALIFICATIONS

While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection can warrant disciplinary action.

Protection under this Policy will not mean protection from disciplinary action arising out of false, frivolous, baseless or bogus allegations made by the Whistleblower knowingly. If the investigation later reveals that the Protected Disclosure was made with a malicious intention, appropriate action could be taken against the Whistleblower.

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Group in order for the Group to accord the necessary protection to him. However, the Group reserves its right to investigate into any anonymous disclosure. A report should be made in good faith.

7. AMENDMENT

The Company reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Whistleblowers unless the same is notified to the Whistleblowers in writing. This document shall be published on the Company's website for external parties and the public to be aware of the Policy and the available reporting channels to raise concerns with the Company.