

## **WHISTLEBLOWING POLICY**

### **1. INTRODUCTION**

See Hup Group is committed to maintaining the highest standard of integrity and propriety in conducting its businesses and operations.

This Whistleblowing Policy is developed to provide a structured reporting channel and guidance to all employees and external parties.

### **2. OBJECTIVES**

This Whistleblowing Policy is established to ensure the achievement of the following key objectives:-

- To encourage and develop a culture of accountability and integrity within See Hup Group of Companies which in turn shall enhance the Group's credibility to all stakeholders;
- To facilitate with a secure and confidential platform for all employees, external parties and other stakeholders to escalate apprehensions and observations on any condoned practices or misconduct;
- To provide reassurance that whistleblowers will be protected from detrimental action or prejudicial treatment for the disclosure of concerns in good faith; and
- To serve as an early warning precautionary measure for the Group to take action on any wrongdoings before any further damages or inconveniences are resulted.

### **3. SCOPE**

This Whistleblowing Policy is applied to all matters involving the Group's employees and other stakeholders within relevant relationship or engagement with the Group, where relevant. In general, any improper conduct (misconduct or criminal offence) includes, but is not limited to, the following:

- suspected criminal offence;
- impropriety, corruption, acts of fraud, theft and/misuse of the Company's properties/resources;
- abuse of power or authority;
- serious conflicts of interest without disclosure;
- sexual harassment;
- bribery, blackmail and miscarriage of justice;
- attempts to suppress or conceal any information relating to any of the above; and
- non-compliance or inappropriate business practice

### **4. WHISTLEBLOWING PROCEDURES**

The whistleblowing procedures outline the Company's commitment to have a channel in which employees and external parties are able to report instances of unethical, unlawful or undesirable conduct:-

- The whistleblower is encourages to come forward immediately with any information that he or she, in good faith and reasonably believes that an improper conduct was committed, is being committed or will be committed.
- For any of such concern, initial disclosure or reporting shall be made to the immediate line manager or Head of Department. Nonetheless, if there is any reasoning that the whistleblower is reluctant to do so; the whistleblower may choose to report the concerns in writing to the Audit Committee Chairman.
- The report must be in writing, submit via post or email. To ensure that there is a clear understanding about the issue(s) raised, the report should be sealed in an envelope if sent via post with "**Strictly Private & Confidential**" indicated and addressed to:

By Email : **whistle@seehup.com.my**  
By Mail : Mr Lee Phay Chian  
Chairman of Audit Committee  
1062, Mukim 6, Jalan Perusahaan  
Kawasan Perusahaan Perai,  
13600, Perai.

- In order to carry out and facilitate an investigation, the whistleblower shall disclose key details and information on the matter on hand which may include, but not limited to, the following:
  - Nature of improper conduct;
  - Date and location of the occurrence;
  - Details of the identity of the alleged wrongdoer;
  - Further details of the incidence and disclosure of documentary evidence, if any;
  - Particulars of witnesses, if any; and
  - Other information which may be deemed useful in facilitating the preliminary assessment process and subsequent course of actions.
- At present, all reports received anonymously will be treated with confidentiality and is directed to the Chairman of Audit Committee (“Chairman”) and a Prescribed Officer (i.e., person authorised to receive reports on whistleblowing matters), as designated by the Chairman.
- Each report received shall be reviewed and assessed to determine whether it is related to an improper conduct or excluded from the scope of this Policy. If the Prescribed Officer is tasked to carry out the review, a general recommendation shall be made to the Chairman following the review.
- In overall, the Chairman has the authority to make a decision or execute an action which include, but not limited to, the following:
  - Reject and close the report;
  - Direct the matter as reported or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
  - Provide resolution without initiating further with an investigation;
  - Direct an investigations on the report and any persons involved or implicated;
  - Suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact finding or to avoid any employee’s exposure to threat or harm;
  - Obtain any other assistance (for instance, external auditors or legal advice); and
  - Refer the report to the police or any other appropriate enforcement authority.
- For any investigation initiated, the Chairman may designate any person, from the Group or external party, as part of an independent investigation working group, to conduct any inquiry or to carry out any other process pursuant to this Policy (for instance, any meeting or internal audit).
- Upon conclusion of the investigation, all observations and findings are compiled and reported to the Audit Committee for their deliberation. The Audit Committee and Chairman will review and conclude with a decision on the findings as reported. A report shall be prepared to document the details of the issues reported, decision concluded and actions carried out in addressing the report.
- The whistleblower will be informed of the result of any investigation or action or decision taken by the Group as soon as practicable.

## **5. CONFIDENTIALITY AND PROTECTION**

For each whistleblowing exercise, the identity of the whistleblower will be accorded with protection of strict confidentiality unless otherwise required by law or for purposes of any proceedings by or against the Company.

The said protection will be granted by the Company only when the whistleblower satisfies all the following conditions:-

- Disclosure is done in good faith and was not made for personal gain or interest, i.e. which may be established either directly or indirectly;
- The whistleblower has reasonable belief that the information and any allegations disclosed are true; and
- No means of communication or disclosure was undertaken by the whistleblower to any other party not relevant to the disclosure.

Furthermore, the whistleblower will be protected from adverse employment action (i.e. penalty, dismissal, demotion or suspension) within the Group as a consequence of his or her disclosure.

Likewise, the Group will not tolerate if it is noted that the whistleblower knowingly or recklessly makes false and malicious allegation in bad faith to discredit, humiliate or damage the reputation of another party. Should such instances occur, the parties responsible may be subjected to the appropriate disciplinary action, including but not limited to legal action, where applicable.

## **6. REVIEW OF POLICY**

The Board of See Hup Consolidated Berhad can modify this policy unilaterally at any time without notice. In order to ensure compliance with laws and regulation and/ or to accommodate organizational and business developments within the Group, modification may be initiated as necessary.