



WHISTLEBLOWING POLICY

1.0 OBJECTIVES

- 1.1 The Company is committed to foster a working environment that practices good corporate governance and upholds integrity and ethical behaviour in all its operational activities and business dealings within the Company and its subsidiaries (“the Group”).
- 1.2 The Whistleblowing Policy provides an avenue for illegality, improper conduct and wrongdoing in the Group to be reported and investigated and for appropriate remedy and/or disciplinary actions to be taken before serious damage is caused, and to mitigate the risk of recurring.
- 1.3 This Policy provide a confidential channel to whistleblower to report in good faith any serious concern of Improper Conduct and/or wrongdoing without fear of being subject to Detrimental Action.

2.0 APPLICATION AND SCOPE OF POLICY

- 2.1 This Policy shall apply to all employees and Directors of the Group.
- 2.2 This Policy encourages employees and Directors of the Group, as well as external parties to report, in good faith, any suspected or known Improper Conduct or wrongdoing committed by employees of the Group prior to seeking resolution outside the Group.
- 2.3 This Policy does not replace the Group’s existing policy for handling employee grievances or complaints, which will continue to be administered by the Human Resources Department of the Group.
- 2.4 This Policy does not affect the rights or obligations of anyone to report a criminal matter to an external party as may be required by law.

3.0 OVERSIGHT OF POLICY

- 3.1 This Board of Directors of the Company has overall responsibility for this Policy and shall oversee the implementation of this Policy.

4.0 TYPES OF WRONGDOINGS

- 4.1 “Improper Conduct” is described as any conduct which if proved, constitutes a criminal offence, or any conduct that constitutes a wrongdoing and may include the following:



<ul style="list-style-type: none"> ♦ Commission of fraud, corruption, unlawful acts ♦ Commission of acts which intimidate, harass or victimize others ♦ Exposure of Company's properties, facilities or staff to the risks of safety and security ♦ Misappropriation of monies, facilities or properties ♦ Criminal act ♦ Blackmailing ♦ Taking or giving kickbacks, bribes, favours, privileges ♦ Racial or sexual harassment ♦ Financial malpractice 	<ul style="list-style-type: none"> ♦ Intentional misrepresentation of the Company's financial statements ♦ Breach of law, regulation or rule that is applicable to the Company ♦ Violation of Company's policies, procedures, code of conduct ♦ Involvement in conflict of interest or business opportunities positions ♦ Misuse of confidential information ♦ Concealed facts or information with an intention to mislead ♦ Negligence ♦ Any other improper or unethical conduct or behaviour that would cause significant harm to the Group or to any person
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5.0 REPORTING IN GOOD FAITH

- 5.1 Any person reporting of Improper Conduct ("Whistleblower") must be done in good faith with reasonable belief and probable grounds that the information is true, without malicious intent, false allegation, ulterior motives or for personal gains.
- 5.2 If allegations are proven to be malicious, parties concerned may be subject to disciplinary action (which may include terminate of employment), up to and including legal action, where applicable.

6.0 CONFIDENTIAL INFORMATION

- 6.1 All allegations reported to the Company are treated in strict confidence, including the identity, occupation, address or whereabouts of the Whistleblower and person against whom the whistleblower has made and all concerns raised in order to protect the whistleblower and any person from victimization or harassment arises from the reporting.
- 6.2 Consent of Whistleblower will be sought should there be a need to disclose identity for investigation purposes. The Whistleblower may be required to come forward as witness in accordance with applicable laws and regulations.
- 6.3 The Whistleblower and any person who has knowledge of the Improper Conduct shall make all reasonable efforts to maintain the confidentiality of the Confidential Information, in order not to jeopardise any investigation.



7.0 PROTECTION TO WHISTLEBLOWER FROM DETRIMENTAL ACTION

- 7.1 Any employee who made a report of Improper Conduct in good faith shall not be subject to discrimination, dismissal, demotion, suspension, disadvantages, intimidation or harassment, any action causing injury, loss or damage, or any other retaliatory actions ("Detrimental Action") by the Company.
- 7.2 Any employee who takes any Detrimental Action against the employee who has reported of Improper Conduct in good faith shall be subject to disciplinary action (which may include termination of employment), up to and including legal action, where applicable.
- 7.3 Any employee who reported Improper Conduct in good faith and who has been subject to Detrimental Action may lodge a complaint using the form appended to this Policy as Appendix B. The same procedures on investigates Improper Conduct shall apply to complaints of Detrimental Action.

8.0 PROCEDURE OF REPORTING IMPROPER CONDUCT AND INVESTIGATION

8.1 Reports by Employee and External Party

- 8.1.1 An employee or external party is advised to report an Improper Conduct as soon as he/she discovers the commission or an intended commission of an Improper Conduct or if he/she is instructed to participate in any Improper Conduct.
- 8.1.2 The report shall be in writing by using the form appended to this Policy as Appendix A with supporting evidence.
- 8.1.3 A Whistleblower may remain anonymous when reporting suspected and/or known wrongdoings. However, anonymous report is not encouraged as it would be difficult to obtain further information for investigation purpose.
- 8.1.4 An employee may not avail himself/herself to the protection against Detrimental Action if the report of Improper Conduct is not made in good faith and/or the he/she has participated in the Improper Conduct reported, and/or he/she has breached the obligation of confidentiality of this Policy.

8.2 Channel

- 8.2.1 Any Improper Conduct shall be raised with the respective Head of Departments. However, if it is deemed not appropriate to do so, the concern should be reported to Group Managing Director.

Attention : Group Managing Director
Name : Mr. Tiong Chiong Hiiung
Email : john.tiong@cck.com.my



- 8.2.2 In the case where reporting to management is not possible, Whistleblower can report Improper Conduct to the Audit Committee Chairman. The Audit Committee Chairman will deliberate the matter reported and decide on the appropriate action.

Attention : Chairman of Audit Committee
Name : Ms. Wong Siaw Wei
Email : jessicawsw@hotmail.com

8.3 Investigation

- 8.3.1 Upon receipt of the concern, the Group Managing Director/Chairman of Audit Committee (depending on who is the recipient of the reporting) will set up an investigating team promptly to conduct thorough investigation on the issue raised if there are merits to initiate an investigation.

- 8.3.2 The findings and recommendations shall be reported to the Group Managing Director/Chairman of Audit Committee for a decision on whether to close the case or to proceed to a full investigation of the allegation.

- 8.3.3 Upon completion of an investigation, full report and next cause of action will be reviewed by the Group Managing Director/Chairman of Audit Committee for their deliberation. In the event the allegation is substantiated, the Group Managing Director/Chairman of Audit Committee will recommend corrective actions to be taken to mitigate the risks of such Improper Conduct recurring and/or recommend disciplinary action to be taken against the wrongdoer.

- 8.3.4 In such cases where the Group Managing Director and/or the Chairman of Audit Committee is implicated, the Audit Committee may select other personnel or appoint an independent third party to investigate the allegations, and the Audit Committee shall review the investigation reports and determine actions to be taken.

- 8.3.5 In cases which involve criminal offence, the matter should be referred to the relevant authorities, such as police and Malaysian Anti-Corruption Commission for further investigation.

- 8.3.6 All information, records, reports and any documents relating to the investigation of the Improper Conduct shall be kept securely to ensure its confidentiality.

8.4 Reverting to Whistleblower

- 8.4.1 The Company will inform the Whistleblower that the matter is closed, or the matter has been referred to authorities, or investigation will be carried out, or investigation has been completed and the findings has been presented to the Audit Committee.

- 8.4.2 As the findings are confidential, the details of the findings will not be disclosed to the Whistleblower.



9.0 WHISTLEBLOWER PROTECTION ACT 2010

- 9.1 The Whistleblower Protection Act 2010 came into force on 15 December 2010. The Act protects Whistleblower in the form of confidentiality of their information, immunity from civil and criminal action.
- 9.2 In the event that there are discrepancies between this Policy and the Whistleblower Protection Act 2010, the Act shall prevail.

10.0 REVIEW

- 10.1 The Board will review this Policy periodically to assess its effectiveness, and in any event, at least once every 3 years.

Reference No. : _____

REPORT OF IMPROPER CONDUCT

A. Particulars of Whistleblower					
1	Name		:		
2	NRIC No. / Passport No.		:		
3	Employee No.		:		
4	Designation		:		
5	Department / Division		:		
6	Correspondence Address		:		
7	Email Address		:		
8	Telephone No.	Mobile	:	Office	:
B. Information of Employee involved in Improper Conduct					
Individual 1					
(a)	Name of employee		:		
(b)	Designation		:		
(c)	Department / Division		:		
(d)	Relationship with Whistleblower		:		
(e)	Are you personally affected by the Improper Conduct?		:	Yes	No
If NO, please state the particulars of person(s) affected by the Improper Conduct:					
	(a) Name of employee		:		
	(b) Designation		:		
	(c) Department / Division		:		
	(d) Relationship with Whistleblower		:		
Individual 2					
(a)	Name of employee		:		
(b)	Designation		:		
(c)	Department / Division		:		
(d)	Relationship with Whistleblower		:		
(e)	Are you personally affected by the Improper Conduct?		:	Yes	No

If NO, please state the particulars of person(s) affected by the Improper Conduct:			
(a) Name of employee		:	
(b) Designation		:	
(c) Department / Division		:	
(d) Relationship with Whistleblower		:	
C. Details of Improper Conduct			
1	Date	:	
2	Time	:	
3	Place	:	
4	Brief description of the Improper Conduct and how you know about it.	:	
<i>(Please submit evidence, if available.)</i> <i>(Please attach additional sheets, if necessary.)</i>			
D. Declaration			
1	I hereby declare that all information provided in this Form is true and accurate to the best of my knowledge and belief.		
2	I hereby agree that the information provided herein to be used for investigation purpose and may be forwarded to another department, authority or enforcement agent for purpose of investigation.		
<div style="border-top: 1px solid black; margin-top: 20px;"> <div style="display: flex; justify-content: space-between;"> <div>Signature</div> <div></div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div>Name :</div> <div></div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div>Date :</div> <div></div> </div> </div>			

For Office Use Only		
File No.	:	
Received by (name of officer)	:	
Date	:	



Reference No. : _____

COMPLAINT OF DETRIMENTAL ACTION

A. Particulars of Complainer					
1	Name	:			
2	NRIC No. / Passport No.	:			
3	Employee No.	:			
4	Designation	:			
5	Department / Division	:			
6	Correspondence Address	:			
7	Email Address	:			
8	Telephone No.	Mobile	:	Office	:
B. Information of Detrimental Action					
1	Name(s) of person(s) committing the Detrimental Action		:		
2	Designation		:		
3	Department / Division		:		
4	Relationship with Complainer		:		
5	Are you personally affected by the Detrimental Action?		:	Yes	No
If NO, please state the particulars of person(s) affected by the Detrimental Action:					
(a) Name of person affected by the Detrimental Action		:			
(b) Designation		:			
(c) Department / Division		:			
(d) Relationship with Complainer		:			
C. Details of Detrimental Action					
1	Date	:			
2	Time	:			
3	Place	:			
4	Brief description of the Detrimental Action		:		
(Please submit evidence, if available.) (Please attach additional sheets, if necessary.)					

D. Declaration

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|---|---|
| 1 | I hereby declare that all information provided in this Form is true and accurate to the best of my knowledge and belief. |
| 2 | I hereby agree that the information provided herein to be used for investigation purpose and may be forwarded to another department, authority or enforcement agent for purpose of investigation. |

Signature

Name :

Date :

For Office Use Only

File No.	:	
Received by (name of officer)	:	
Date	:	