

AMTEL HOLDINGS BERAHD [199601037096 (409449-A)]
WHISTLE BLOWING POLICY

Policy Statement

Amtel Holdings Berhad (“AHB”) and its group of companies (“AHB Group”) are committed to achieving and maintaining the highest standards of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognising the abovementioned values, AHB Group encourages employees to report matters of serious concerns and/or improper conduct that may affect the professional and compliant operation of AHB Group’s businesses and its reputation.

Scope of Policy

This policy is intended to assist the employees to disclose any matters of serious concerns and/or improper misconduct through internal channel. Whistle blowing matters may include but are not confined to:-

- Breach of legal or regulatory requirements;
- Criminal offences, e.g. fraudulent activities;
- Abuse of Power;
- Misuse of Company’s Property;
- Theft or embezzlement; or
- Corruption and bribery

Only genuine concerns should be reported. The 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.

Procedure

- (i) Any malpractice concerns should first be raised with the immediate superior. The immediate superior should then raise the matter with the Management as appropriate i.e. up to the level of Group Managing Director (“Group MD”). This complaint of malpractice should be passed on as soon as is reasonably possible by the immediate superior.

However, if the malpractice in question directly involves the relevant superior or the employee believes he/she cannot raise his/her concerns within normal reporting lines, then he/she should report the matter to the Group MD. Channel of reporting to the Group MD are as follows:-

Name : Dato’ Koid Hun Kian
Email : johnkoid@amtel.com.my

The Group MD may designate an appropriate person to receive and take note of the complaint or set up an inquiry to investigate the matter further (herein refer to as “Investigating Officer”).

- (ii) Where reporting to Management is a concern, the report should be made to the Chairman of the Audit Committee. Channel of reporting to the Chairman of the Audit Committee are as follows:-

Name : Ir Chew Yook Boo
Email : ybchew@amtel.com

The Chairman of the Audit Committee will deliberate the concern with the committee members and decide on the appropriate course of action.

- (iii) For record and to ensure a fair and transparent investigation, the reporting employee shall notify and furnish a copy of all written reports and supporting documentations to the Head of Human Resource Department on the malpractice concerns, raised to each level of Management and/or Chairman of the Audit Committee.

Investigation & Timescale

Wherever possible, the reporting employee should report matters in writing and provide supporting documentation. If this is not possible, oral reporting is acceptable.

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; and/or
- be referred to the Internal Auditor and/or the External Auditor.

The Group MD or the Investigating Officer will write to the reporting employee as soon as practically possible acknowledging that the concern has been received as well as for the following purposes:-

- advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be and on the action that is proposed;
- giving an estimate of how long the investigation time frame will take to provide a final response; and
- if the investigation is a prolonged one, keep the complainant informed as to the progress of the investigation and as to when it is likely to be concluded.

Protection & Confidentiality

Any anonymous disclosure will not be entertained. The reporting employee is required to disclose his identity to AHB Group. However, AHB Group reserves its rights to investigate into any anonymous disclosure which will take into account amongst others the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources.

The Company will treat all such disclosures in a confidential and sensitive manner. A whistleblower will be accorded with the protection under Whistleblower Protection Act 2010. However, there may be circumstances in which AHB Group may be required or legally obliged to reveal the reporting employee's identity as part of the evidence required, for example, where an investigation leads to legal proceedings being initiated. If this is the case, AHB Group will take all reasonable steps to ensure that the reporting employee suffers no detriment. An employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to

be committed within AHB Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Notification

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.