

WHISTLE BLOWER POLICY

**REACH TEN
GROUP**

WHISTLE BLOWER POLICY

APPROVED BY,



DIRECTOR

CHIN YU LAY

- **INTRODUCTION**

Reach Ten Holdings Berhad (“the Company”), its subsidiaries (collectively known as the “Group”), and its employees are committed to high standard of ethical and legal business conduct. The Group is also committed to present accurate and factual financial information to guide the Board of Directors of the Group, its shareholders, financial markets and other stakeholders in making informed decisions.

For these reasons, the Board and the Management of the Group must maintain a workplace that practices good corporate governance and upholds integrity in all its operational activities and business dealings. To achieve this objective, the Group therefore encourages its Board members, employees and stakeholders to report inappropriate behaviour or misconduct relating to fraud, corrupt practices and/or abuses involving the Group’s resources.

- **SCOPE OF WHISTLEBLOWER POLICY**

The primary purpose of this policy is to govern the reporting and handling of wrongdoing at Reach Ten Group and its subsidiaries. This policy does not replace the Group’s existing policy for handling employee grievances or similar complaints, which will continue to be administered by the Human Resources Departments of Reach Ten Group and its subsidiaries.

- **WRONGDOING**

Wrongdoing shall mean, but not limited to, reporting of fraudulent financial information, actual or suspected fraud, misappropriation of monies, misrepresentation, conceal facts or information with intention to mislead, violation of laws and regulations, endangerment of employees or public health and safety, violation of Group’s policies, taking or giving kickbacks, bribes, favours, privileges, criminal offence and blackmailing.

- **REPORTING IN GOOD FAITH**

The Group expects all parties to act in good faith and have reasonable grounds when making a report. If allegations are made with malicious intent, the Group will take appropriate action against the parties concerned including legal action, where applicable.

Reach Ten Group is also committed to protect the whistleblower from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

- **PROTECTION FROM RETALIATION AND REPRISAL**

The Group views retaliation or reprisal against the whistleblower seriously. The Group provides assurance to the whistleblower that he/she would be protected from retaliation or reprisal from his/her reporting superior, manager or department head.

The Group assures that no disciplinary action can be taken against the whistleblower on condition that the information provided is accurate, factual and there is no element of malicious intent.

- **WHISTLEBLOWER PROTECTION**

The Group commits to ensure that all disclosed information, including the identity of the whistleblower shall be treated with strict confidentiality. All personnel, directly or

indirectly working relative to a whistleblowing case, shall strictly protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need to know basis (e.g. requirement to testify in court). If such a situation arises, the Group shall discuss and seek consent with the whistleblower first before proceeding with the case.

The protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the disclosures in bad faith.

- **RESPONSIBILITY OF WHISTLEBLOWER**

- (a) Whistleblower makes the disclosure in good faith.
- (b) Whistleblower reasonably believes that the information and allegations are substantially true.
- (c) Whistleblower is not acting for personal gain. If the case involves the complainant's personal interests, it must be informed at the outset.

- **WHISTLEBLOWER PROTECTION ACT 2010**

In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the Act shall prevail.

An act to promote disclosure of information about any corruption or other misconduct. The Act will provide protection to whistleblowers from any act prejudicial effect of disclosure has been made.

Terms Protection

- The informant willing to be identified by Malaysian Anti-Corruption Commission ("MACC").
- The informant personally attends and meets with MACC officers either in the office or at any place.
- If the disclosure of Improper Behaviour made by letter/email/phone calls/short message service, informant must reveal his identity and address of or the manner in which he can be contacted.

Types Of Protection

- The identity of the informant and the information provided is kept confidential and not to be disclosed to anybody, even during the trial in court. (Section 7(1)(a) Whistleblowers Protection Act 2010)
- Whistleblowers should not be liable to any civil action, criminal or disciplinary consequences of such disclosure. (Section 7(1)(b) Whistleblowers Protection Act 2010)
- Whistleblowers are protected from any act prejudicial to the outcome of the reaction disclosures have been made. (Section 7(1)(c) Whistleblowers Protection Act 2010)

- Protection is also given to those who have connection / relationship with the informant. (Section 7(3) Whistleblowers Protection Act 2010)

Attached the Wrongdoing Report Form.

- **CONFIDENTIALITY**

The Group recognises that anonymity to whistleblowers who willingly come forward to report a suspicion of misconduct is key to encouraging such reporting. However, to prevent false and malicious reporting, poison letters and abuse of the reporting channel, all whistleblowers must identify themselves and provide contact information in their report to facilitate further investigation. Whistle blowing investigation will only be initiated with complete contact information received. The Group reserves its right to investigate into any anonymous disclosure.

This is to enable verification of each report and to obtain further information, if required. It is also to facilitate any further investigations by auditors or the authorities where the identity of the informer is required by law. Contact information is needed to facilitate the communication of results of investigation to the whistleblower. All reports and information provided to the Group are treated in strict confidence. Information will only be disclosed on need-to-know basis to facilitate investigation.

The employee's identity will not be revealed unless it is required by law.

- **REPORTING WRONGDOING**

- a) The whistleblower should promptly report the suspected or instances of wrongdoing to the Human Resource Manager.
- b) If there is a need to contact someone other than the Human Resource Manager, the whistleblower may address the report directly to the Audit Committee Chairman of the Board.
- c) The report must be in writing, submit via post or email, to ensure that there is a clear understanding about the issues raised.

The report should be sealed in an envelope if sent via post with "Private and Confidential" indicated and addressed to:

Head of Human Resource Department
Reach Ten Holdings Berhad
AT612, Level 6, Tower A1
ICOM SQUARE, Jalan Pending,
93450 Kuching Sarawak
Malaysia
Email: hr@reach10.com

- d) The Audit Committee Chairman or the Human Resource Manager who receives the report must promptly act to investigate and resolve the issue.

- e) The whistleblower shall be informed on the outcome of the investigation.

f) All investigations shall be tabled to the Audit Committee of the Board that has the authority to ensure effective implementation of the whistleblower policy. The Audit Committee shall update the Board of Directors on reports that require their attention and approval.