

Revision No.	01
Effective Date	26-02-2020



KIA LIM BERHAD

Company No.: 199501013667 (342868-P)

WHISTLEBLOWER POLICY

Kia Lim Berhad (“Kia Lim”) is committed to promote and maintain a high standard of transparency, accountability and ethics as well as good Corporate Governance practices in the workplace.

Whistleblowing is an act of voluntary disclosure / reporting to the Management of Kia Lim for further action of any wrongdoings committed or about to be committed by an employee of Kia Lim.

OBJECTIVE OF THE POLICY

The objective of the Whistleblower Policy is to:

1. Provide an avenue for all employees and members of the public to disclose any improper conduct or any action that is or could be harmful to the reputation of Kia Lim and / or compromise the interest of stakeholders;
2. Provide proper internal reporting channel to make a disclosure to disclose any improper or unlawful conduct in accordance with the procedures as provided for under this policy;
3. Address a disclosure in an appropriate and timely manner;
4. Provide protection for the whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such person’s confidentiality; and
5. Treat both the whistleblower and the alleged wrongdoer fairly.

TYPES OF WRONGDOING

Parties can report a whistleblowing complaint if they are aware of any wrongdoing, including, but not limited to the following:

1. Fraud, corruption or forgery;
2. Misappropriation of fund or assets;
3. Criminal activities;
4. Sexual harassment;
5. Misuse of confidential information;
6. Conflict of interest;
7. Damage to the environment;
8. Danger to health and safety of any individual;
9. Theft or insider trading; or
10. The deliberate concealment of any of the above or other acts of wrongdoing.

REPORTING CHANNELS

If you are aware of any wrongdoing or malpractice, unethical and unlawful conduct or risks to financial, operational, safety and health within Kia Lim Group, the report should be made to the Chairman. Channel of reporting to the Chairman can either via email or by mail:

Name : Mr Loh Chee Kan
Email : sined@kialim.com.my
Mailing Address : Mark “**Strictly Confidential**”
Kia Lim Berhad
Wisma Ng Hoo Tee
No. 79, Jalan Muar
83500 Parit Sulong
Batu Pahat, Johor
Malaysia
Attention : Chairman

Alternatively the whistleblower may write directly to the relevant regulatory authorities as prescribed by the Whistleblower Protection Act 2010 including Polis Diraja Malaysia (PDRM), and Malaysian Anti-Corruption Commission (MACC) and forward a copy of the said report to Kia Lim to enable Kia Lim to conduct its own internal investigations.

Lodge Online Report : <http://portaladuan.sprm.gov.my/>
MACC Mobile : Download MACC Mobile apps at:

- App Store
- Google Play

MACC Hotline : 1-800-88-6000
Walk In : Walk-in to any MACC office.
Email : info@sprm.gov.my
SMS : +6019-6000 696
Fax : +603-8870 0934
Mailing Address : MACC Headquarters
No.2 Lebuw Wawasan
Presint 7, 62250 Putrajaya.

CONTENT OF DISCLOSURE

Anonymous disclosure will not be entertained. All disclosure made herein should contain the following information:

1. Details of the person(s) involved;
2. Details of the allegation
 - a) Nature of the allegation,
 - b) Location and date / time the alleged misconduct took place;
3. Any supporting evidence (if available); and
4. Other relevant information.

Protection will be given to whistleblower against any unfair practice not limited to retaliation, threat or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or including any direct or indirect use of authority to obstruct the whistleblower's rights to continue to perform his/her duties including making further disclosure.

Kia Lim has the right to redirect the disclosure to other relevant grievances channel if the disclosure does not fall under this policy.

FREQUENTLY ASKED QUESTIONS (FAQ)

1. What is 'Whistleblowing'?

Whistleblowing is an act of voluntary disclosure / reporting to the Management of Kia Lim for further action of any wrongdoings by an employee of Kia Lim.

2. What is a 'Wrongdoing'?

Kia Lim defines "Wrongdoing" as a wrongful, improper, or unlawful conduct committed by relevant parties. Wrongdoing includes but not limited to:

- a) Fraud, corruption or forgery;
- b) Misappropriation of fund or assets;
- c) Criminal activities;
- d) Sexual harassment;
- e) Misuse of confidential information;
- f) Conflict of interest;
- g) Damage to the environment;
- h) Danger to health and safety of any individual;
- i) Theft or insider trading; or
- j) The deliberate concealment of any of the above or other acts of wrongdoing.

3. How will I be protected?

You will be accorded with the protection under this Policy 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

4. Will my identity be kept confidential?

Yes. Your identity will be kept confidential.

5. Will I be involved in the investigation when I report a 'Wrongdoing'?

You will only be requested to assist when more information is needed during the investigation.

6. What will happen after I made my disclosure?

Upon receipt of your disclosure, the Audit Committee will determine whether the nature of the complaint falls within the category of Wrongdoing. If it is a Wrongdoing, an investigation team will be appointed to investigate the alleged wrongdoing or dismissed, if it is not. In both cases, you will be notified on the decision made, including the outcome of the investigation.