



## **WHISTLEBLOWING POLICY**

### **POLICY STATEMENT :**

JHM Consolidation Berhad (“the Company”) is committed to promote and maintain high standards of transparency, accountability, ethics and integrity at the workplace. An important aspect of accountability and transparency is a mechanism to enable staff and other members of the company and third parties to voice genuine concerns in a responsible and appropriate manner.

The Whistleblowing Policy is designed to support the Company’s Integrity, Innovation, Teamwork, Excellence & Harmony values and facilitate employees’ and third parties’ concerns about possible improprieties at the earliest opportunity to ensure that concerns can be raised without fear of reprisal or Detrimental Action.

### **SCOPE :**

This Policy applies to all employees and third parties who have become aware of or genuinely suspects on a reasonable belief that an employee of the Company has engaged, is engaged or is preparing to engage in any Improper Conduct.

### **IMPROPER CONDUCT :**

Improper Conduct is any conduct which if proved, constitutes a Disciplinary Offence or a criminal offence. These include, but are not limited to, the following:

- i. Criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
- ii. Failure to comply with legal or regulatory obligations;
- iii. Misuse of the Company’s funds or assets;
- iv. Breach of Group Policies and Code of Conduct;
- v. Misuse of confidential information;
- vi. An act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
- vii. Unsafe work practices or substantial wasting of company resources;
- viii. Abuse of power by an officer of the Company; and
- ix. Concealment of any of the above.



#### **PROCEDURES :**

(A) Any concern should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Chief Executive Officer ('CEO'). Channel of reporting to the CEO is:

- i. Name : Dato' Tan King Seng
- ii. Email : [whistleblowing@jhm.net.my](mailto:whistleblowing@jhm.net.my)
- iii. Mail : 15-1-21, Bayan Point, Medan Kampung Relau, 11900 Penang
- iv. Attention : Group CEO

(B) In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit Committee and Risk Management Committee. Channel of reporting to the Chairman is:

- i. Name : Ms Wong Chi Yeng
- ii. Email : [whistleblowingAC@jhm.net.my](mailto:whistleblowingAC@jhm.net.my)
- iii. Mail : 15-1-21, Bayan Point, Medan Kampung Relau, 11900 Penang
- iv. Attention : Chairman - Audit Committee and Risk Management Committee

A disclosure should include the name, designation and contact number of the Whistle-blower.

#### **ACTION :**

- (A) All reports will be investigated promptly by the person receiving the report. If required, he/she can obtain assistance from other resources within the Group (e.g. Internal Auditor, Human Resource Department, Finance Department etc.). The progress of investigation will be reported to the Audit Committee and Risk Management Committee no later than at the next scheduled meeting.
- (B) Reports received will be treated as confidential.
- (C) Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee and Risk Management Committee for their deliberation. Decision taken by the Audit Committee and Risk Management Committee will be implemented immediately.
- (D) Where possible, steps will also be implemented to prevent similar situation arising.

#### **NOTIFICATION :**

The Whistle-blower shall be informed of the result of any investigation and/or any action taken by the Company in respect of the disclosure in accordance with the Policy.



## **WHISTLE-BLOWER PROTECTION**

The Whistle-blower or any person related to or associated with the Whistle-blower shall be accorded with protection under the Policy from any Detrimental Action within the Company as a direct consequence of the disclosure provided that the disclosure is made in good faith.

Additionally, the identity of the Whistle-blower and such other Confidential Information shall not be disclosed save with the Whistle-blower's consent or otherwise required by law. The Whistle-blower protection conferred under this Policy is not affected notwithstanding that the disclosure of the Improper Conduct does not result in any disciplinary action of the person against whom the disclosure was made.

## **REVOCAION OF WHISTLE-BLOWER PROTECTION**

The Company reserves the right to revoke the Whistle-blower protection provided pursuant to this Policy if it is of the opinion, based on an investigation that, among others:

- i. The Whistle-blower himself has participated in the Improper Conduct disclosed, except in instances where:
  - (a) The participation was under duress; or
  - (b) In the view of the Company, the participation could be justified under the circumstances.
- ii. The Whistle-blower willfully made a material statement which he knows or believes to be false or did not believe to be true;
- iii. The disclosure of Improper Conduct is frivolous and/or vexatious.