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## **WHISTLEBLOWING POLICY**

1. The Whistleblowing Policy (“The Policy”) provides an independent feedback channel through which matters of concern about possible improprieties and irregularities may be raised in confidence and in good faith, without fear of reprisal.
2. The Policy covers any misconduct or wrongdoing by any director, management, employee and business partner, in regard to their duties and obligations carried out on behalf of Tambun Indah Land Berhad and its subsidiaries (“the Group”).
3. This policy covers the following possible improprieties -
  - i. Matters of financial reporting
  - ii. Fraud
  - iii. Corruption, bribery or blackmail
  - iv. Criminal offences
  - v. Failure to comply with a legal or regulatory obligation
  - vi. Endangerment of employees’ health and safety
  - vii. Miscarriage of justice
  - viii. Abuse of power
  - ix. Concealment of any or a combination of the above
4. The principles underpinning the policy are as follows -
  - i. All concerns raised will be treated fairly;
  - ii. The Group will not tolerate harassment or victimization of anyone raising a genuine concern;
  - iii. Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
  - iv. The Group will ensure that any individual raising a concern is aware of who is handling the matter; and
  - v. The Group will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Group, however, does not extend this assurance to a person who maliciously raises a matter he/she knows is untrue.
5. Protection of the Whistleblower -
  - i. An employee, who is a Whistleblower, will be protected as outlined in the Whistleblower Protection Act 2010 for making a disclosure of improper conduct to the Group in good faith, unless the conditions listed in (iii) below are not fulfilled.
    - a. Confidentiality and identity of the Whistleblower unless otherwise required by law or consent obtained from the Whistleblower; and
    - b. Protection from detrimental action, including disciplinary measures, demotion, suspension, termination of employment or service or any other retaliatory action

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- ii. Business partner or member of public, including customer, contractor, consultant, vendor and any other third party who is a Whistleblower, will be protected by the Group whereby his/her identity and details will be strictly kept confidential, unless the conditions listed in (iii) below are not fulfilled.
- iii. The Whistleblower will be protected by The Group when the disclosure fulfils the following conditions:-
  - a. The disclosure is reported in good faith, and is not frivolous or vexatious;
  - b. The disclosure is not made with the purpose of personal gain or interest;
  - c. It is not a false or untrue disclosure; or
  - d. It is not disclosed with the purpose to avoid dismissal or any other disciplinary action.

6. The procedures are as follows -

- i. If any person believes reasonably and in good faith that improprieties exist, he should report the concern using a standard Whistleblowing report form in writing or by email:-

Reporting Mode	Contact Details
Letter	(mark, "Strictly Confidentiality to be unsealed by Addressee only") Tambun Indah Land Berhad Address: 12-01 Penthouse Wisma Pantai Jalan Wisma Pantai, Kampung Gajah, 12200 Butterworth, Penang, Malaysia.
Attention to	Mr Lai Fook Hoy (Independent Non-Executive Chairman)
Email to	<a href="mailto:laifh@ymail.com">laifh@ymail.com</a> (Mr Lai Fook Hoy)  or  <a href="mailto:whistleblow@tambunindah.com">whistleblow@tambunindah.com</a> (Mr Lai Fook Hoy and Managing Director)

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- ii. Upon the receipt of a Whistleblowing report, the recipients will promptly review and evaluate the said disclosure and its potential severity to determine the course of action. Where practicable, the recipients will arrange a private meeting with the Whistleblower to obtain further information and details prior to a decision of whether further investigation is required. Therefore, the Whistleblower is encouraged to disclose his/her personal details so that the process of obtaining more information on the allegation can be performed. The decision on whether further investigation is required will be made within 10 working days upon receipt of a Whistleblowing report.
- iii. Where an investigation is required, the recipients will proceed with a formation of the Investigation Team ("IT"), which will include members of the Anti-Bribery Compliance Team ("ABCT"), unless there is a conflict of interest.
- iv. The course of action undertaken or will be undertaken by the IT will be disclosed and communicated to the Whistleblower upon the completion of investigation. Such communication shall be explained by the Coordinator of IT.
- v. The Whistleblower shall commit to the following, before, during and after his/her reporting:-
  - a. Do not attempt to contact the suspect to obtain facts or demand restitution; and
  - b. Do not discuss the case, facts, suspicions or allegations with anyone except with the Independent Non-Executive Chairman and/or the Managing Director or the IT members.
- vi. The Board of Directors ("the Board") or Audit Committee ("AC") shall be informed as soon as is practicable upon receipt of the report under the following circumstances:
  - a. A senior officer is alleged to have engaged in wrongdoing
  - b. The alleged wrongdoing is serious, or
  - c. The risk or adverse impact on the Group is high
- vii. Where applicable, the summary of reports received, results of investigation and course of actions taken will be reported in the AC meeting conducted on a quarterly basis.

#### 7. Principles and basis in conducting an investigation:-

- i. Investigation will be conducted by the IT with the commitment to remain objective, impartial and fair during the investigation process; and pledge to discharge their duties competently with the highest level of integrity.
- ii. The Whistleblower shall not, in any circumstances, attempt to conduct his/her own investigations.
- iii. The IT shall be granted with appropriate authority, resources and unrestricted access to all relevant records for investigation purposes.
- iv. All employees in the Group are expected to provide their cooperation and assistance to the IT throughout the investigation.
- v. Wherever deemed appropriate and practicable, the IT may request and schedule meetings with the person(s) under investigation, or anyone perceived to be involved or has any knowledge of the alleged improper conduct. The meeting shall be conducted privately and all discussions shall be documented and retained by the IT.

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- vi. The IT shall submit a report containing the specific allegation(s) of misconduct, relevant information and supporting documentation, correction action and preventive measure taken to the AC. Subsequently, the AC shall report all cases to the Board of Directors, depending on the severity and implications of the case reported.
  - vii. Depending on the outcome of the investigation, disciplinary action taken may include suspension, termination, or proceeding with legal action.
  - viii. If the Board is of the opinion that the reported case has not been satisfactorily resolved or addressed, and has resulted in a breach of the applicable laws and regulations, including but not limited to, Bursa Malaysia Securities Berhad (“The Exchange”) and Malaysia Anti-Corruption Commission (“MACC”), the Board shall report such case to the applicable authority without any further delay.
  - ix. Subsequently, the Coordinator of IT shall disclose the course of action to the Whistleblower accordingly.
  - x. All disclosures shall be managed in accordance with the provisions of the Personal Data Protection Act 2010 and any other applicable laws.
8. The Group understands that maintaining anonymity of the Whistleblower is essential to encourage anyone to report on any actual or suspected misconduct in the Group. However, the Whistleblower must be able to provide sufficient evidence such as documents, images, footages, audio, email, text messages or any other relevant evidence as proof that the misconduct/wrong-doing will be or has been taken place. In the absence of the foregoing, the Whistleblower must provide credible reasoning/argument that the misconduct/wrong-doing will be or has taken place.

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### **Appendix A: Sample of Whistleblowing Report Form**

<b>Whistleblowing Report Form</b>	
<b>Whistleblower's Contact Information</b>	
Name	
Email address	
Contact Number	
<b>Suspect's Information</b>	
Name	
Designation	
Division and Department (where applicable)	
Email address	
Contact number	
<b>Witness(es) Information (if any)</b>	
Name (1)	
Division of Department (if any)	
Email address	
Contact number	
Name (2)	
Division of Department (if any)	
Email address	
Contact number	
<b>Incidents</b>	
Incidents/Details of Allegation	
Incident Date and Time	
Location of Incident	
How Incident was Detected	
Estimated value involved (in RM)	
Evidence of the Allegation	

*The draft is prepared with the purpose of recommending Tambun Indah Land Berhad ("TILB") on the suggested revision/format for the Anti-Bribery Management System ("ABMS") engagement and shall not be treated as the final copy without the appropriate approval from the management.*

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Other suspected parties involved	
Additional comments/remarks	
<p><b><u>Declaration:</u></b>  I..... I/C No:....., on Date.....  declare that the information provided in this report is true to the best of my knowledge and belief and I have made this disclosure voluntarily. I acknowledge that the Group will use the information furnished in this report for investigation purposes.</p> <p>Date report received:</p> <p>Contact with Whistleblower:</p> <p>Follow-up action taken:</p> <p>Sign off by:</p> <p>1)</p> <p>2)</p>	

<b><i>For Investigation Team Use Only:</i></b>			
Case Number:			
Received by:		Received On:	
Investigation required (Yes/No) (Please state the reason if "No")			
Investigation to be assigned to			
Investigation results			

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Corrective action taken	
Preventive measure taken	
Signed off and approved by	
Date of completion	

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