

KECK SENG (MALAYSIA) BERHAD GROUP

Subject: Group Policy - Whistleblowing Policy	Policy No: 02-01
Applies to: All Employees	Page: 1 of 3
Date: 25 November 2022	Approved by: Board of Directors

Objective:

The Board and Management encourages its employees to report on any suspected or known wrongdoings, and misconduct, and to protect the employee who in good faith has reported such misconduct from any form of disadvantage or reprisal.

Policy and Protection

Employees who have legitimate grounds to report misdeeds can report internally to the Management with assurance that the Management will take matters seriously and respond appropriately.

The Employee known as the “Reporting Party” (“**RP**”) will be assured:

1. Anonymity;
2. Confidentiality; and
3. Protection (provided that the RP is not involved in the reported case).

All disclosures will be treated fairly, properly and addressed in an appropriate and timely manner.

Scope of the Policy

Improper conduct or activities which are considered valid for whistleblowing are :

- possible improprieties in matters of financial reporting;
- a suspected criminal offence;
- fraud;
- corruption, bribery or blackmail;
- breach of contract and breach of law;
- miscarriage of justice;
- non-compliance with regulatory requirements;
- financial or professional misconduct;
- endangerment to health and/or safety of any individual or to the environment;
- unfair treatment;
- improper conduct or unethical behaviour; or
- attempt to suppress or conceal any information relating to any of the above in the workplace.

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Reporting Procedures

The RP may make their report in writing, via email or by telephone to any senior management and/or the Managing Director or Chairman of the Audit Committee (“**AC**”). In addition, the RP may also report independently to the Internal Audit (“**IA**”) Head at:

The Head of the Internal Audit Department
 Keck Seng (Malaysia) Berhad (Property Division)
 10-16, Jalan Sagu 8
 Taman Daya
 81100 Johor Bahru
 Johor
 Tel: 607-3555866 (ext 124)

A report will be drawn up using the prescribed form (Refer to 02A-00). Confidentiality on the fact that a report has been made and to the name of the whistleblower will be maintained to the greatest extent possible.

The name of the employee making the report will be disclosed in the report. Anonymous reports will not be investigated. The report will consist of the following details:

- Date of the reported incident(s)
- Place of the reported incident(s)
- Incident(s) that took place
- Why the RP thinks that there is violation or breach?

Unspecified violations or broad allegations without proper supporting evidence will not be investigated.

Whistleblowers are the RP and not the investigating party. They are not to act on their own in conducting any investigative activities unless requested by investigators. The RP should also refrain from obtaining evidence that he or she does not have a right to access, as improper access is considered a misconduct.

The filing of a report in bad faith is considered a gross misconduct and will subject the RP, if he or she is an employee of the Company to disciplinary proceedings by the Company.

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Procedures in handling reported cases

1. Maintain all records of complaints and reports;
2. Investigate with appropriate assistance and facts, as necessary, including interviews with relevant parties and identified witnesses;
3. Resolve and conclude as soon as practicable;
4. Investigation report to be submitted to the Managing Director or Senior Independent Director for further review and decision;
5. Disclose or report to authorities if necessary or routed to Human Resource (HR) Department if necessary, action is required from HR.

Protection to Whistleblower

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, the whistleblower shall not be subject to unfair dismissal, victimisation, demotion, suspension, intimidation or harassment and discrimination, if the report is made in good faith.

The whistleblower will also be protected under the Whistleblower Protection Act 2010 if he or she makes a disclosure in good faith to an enforcement agency.

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.

If a whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he or she should report the matter to any senior management, Managing Director, AC Chairman and/or IA Head.

Review of the Policy

The Board will review the Policy periodically to ensure that it continues to remain relevant and appropriate.

This Policy was last reviewed and adopted by the Board on 25 November 2022 and is made available on the Company's website at <https://my.keckseng.com>.