

Whistle Blowing Policy

Introduction

An important aspect of accountability and transparency is a mechanism to enable any individual to raise/voice concerns internally in a responsible and effective manner whenever they discover information which they believe may lead to serious malpractices.

Y&G Corporation Bhd is committed to conduct its businesses in an opened and fair manner, practice a healthy working environment and aims to become the most respected and trusted company as stated in the Code of Conduct and Ethics.

This Policy provides a bona-fide platform where an individual can raise a concern about a risk, malpractice or wrongdoing that may affect others such as clients, suppliers, staff, the Company or any other stakeholders. Individual is encouraged to raise genuine concerns at the earliest opportunity and in an appropriate way.

An individual can be defined as personnel under the payroll of the Company or individual/corporation that have dealing with the Company. In essence, it applies to (but not exhaustive to those mentioned below):

- All employees (full-time, part-time, contract);
- Contractors and sub-contractors;
- Business associates;
- Consultants;
- Vendors; and
- Suppliers.

This Policy is designed to:

- Support the Company's values;
- Ensure employees are protected and can raise concerns without fear of reprisals; and
- Provide a transparent and confidential process for dealing with genuine concerns.

This Policy covers possible improprieties in matters relating to but not exhaustive to those mentioned below:

- Financial;
- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Miscarriage of justice;
- Abuse power and position for personal gain;
- Failure to comply with a legal or regulatory obligation;
- Endangerment of an individual's health and safety;
- Sexual harassment; and
- Concealment of any of the above or a combination of them.

A staff wanting to raise a concern should, in the first instance, considers consulting his/her reporting superior (e.g. Manager or Supervisor). If uncomfortable with raising the matter through the normal reporting channels and/or with the Human Resources &

General Administration Department (“**HRGA Dept**”), he/she may want to seek assistance by using the Whistle Blowing Policy.

Principles

The principles underpinning the Whistle Blowing Policy are as follows:

- All concerns raised will be treated fairly and properly;
- The Company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- The whistle blower will be protected from victimisation, harassment or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain, within the Company’s premises to the extent where reasonably applicable;
- An individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- The Company will ensure that the individual raising a concern is aware of who is handling the matter; and
- The Company 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 Company however, does not extend this assurance to someone who maliciously raise a matter he/she knows is untrue.

Grievance Procedure

If any individual reasonably believes in good faith that malpractice exists in the workplace, the individual should report this immediately to the line manager and/or HRGA Dept. However, if for any reason he feels uncomfortable to do so, he can then report the concerns to either the:

- Independent Non-Executive Chairman of the Audit & Risk Committee (“A&RC”); or
- Independent Non-Executive Chairman of the Board of Directors..

The individual should email or contact the A&RC’s Independent Non-Executive Chairman, Mr. Tan Kak Teck (tanakakteck1@gmail.com / Mobile No. 013 - 351 4036).

The individual who has raised concerns internally will be informed of who is handling the matter and how he can make contact with them for further assistance whenever required.

The individual’s identity will not be disclosed without his prior consent. When concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in a court of law), a dialogue will be held with the employee concerned as to how the matter can be resolved.

Outcome

There will be no adverse consequences for anyone who reports a whistle blowing concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary action. The following actions may be taken after investigations into such a case have been completed:

- Disciplinary action (up to and including dismissal) against the wrongdoer dependant on the results of the investigation; or

- Disciplinary action (up to and including dismissal) against the whistle blower if the allegation is found to be malicious or in bad faith; or
- No action to be taken if the allegation proves to be unfounded.

Frequently Asked Questions (“FAQ”)

1) What is the difference between whistle blowing and making a complaint?

In practical terms, whistle blowing occurs when an employee raises a concern about a danger or illegality that affects others (e.g. clients or their employer). The person blowing the whistle is usually not directly or personally affected by the danger or illegality. Consequently, the whistle blower **rarely has a personal interest in the outcome** of any investigation into his concerns. As a result, the whistle blower should not be expected to prove his case; rather he should be seen as raising the concern so others can address it.

This is different from a complaint. When someone complains, he is implying that he has personally been affected. This could involve a breach of his individual employment rights or bullying and he is seeking redress or justice for himself. The person making the complaint therefore has a **vested interest in the outcome of the complaint**, and for this reason, is expected to be able to prove his case.

2) Should concerns be raised confidentially or anonymously?

Usually, the best way to raise a concern is to do so openly. Openness makes it easier for the Company to assess the issue, work out how to investigate the matter, understand any motive behind it and get more on-the-spot information. An individual raises a concern confidentially if he/she gives his/her name on the condition that it is not revealed without their consent. An individual raises a concern anonymously if he does not disclose his name at all. Clearly, if the Company does not know who provided the information, it will be difficult to protect the whistle blower.

3) What information should a whistle blower provide?

Supporting evidence for the allegation is clearly helpful. However, the evidence presented may not meet the standards required under the Evidence Act 1950 but some form of evidence would assist to kick-start and direct the investigation. The individual should contact the designated personnel about his concern at the earliest opportunity rather than wait to collate any evidence.

4) How the internal investigation will be handled when whistle blowing occurs?

- Once a disclosure is received, a preliminary investigation will be established whether the disclosure has merit and can be substantiated by an authorised personnel (“The Investigator”).
- The disclosure will be reviewed to determine if there is enough evidence to confirm the disclosure.
- An unbiased conclusion will be drawn from the facts given by the whistleblower and any other information gathered during the course of the investigation.

- (iv) The Investigator shall prepare a summary report and present it to the Company's A&RC on a quarterly basis. Confidentiality shall be maintained to protect the whistleblower's identity throughout the investigation and after the investigation.
- (v) If the case necessitates further action on the part of the HRGA Dept, a copy of a summary report will be provided to the HRGA Dept.

5) Under what circumstances will the Whistle Blowing Policy's protection be revoked?

- (i) The whistleblower has participated in the improper conduct;
- (ii) The whistleblower wilfully or maliciously made the disclosure, knowing or believing the information is false or untrue;
- (iii) The disclosure is frivolous or vexatious; or
- (iv) The disclosure is made with the intention or motive to avoid dismissal or other disciplinary action.

Approved by the Board of Directors on 11 June 2020.