

Sanwa Group of Companies Whistleblowing Policy & Procedure (WBPP)

POLICY STATEMENT

1. It is important to Sanwa Group of Companies (SWG) that the employees speak up.
2. Whistleblowing reports have to be made in good faith with reasonable belief that the information and allegation is true and not made with bad intentions for personal interest or gain.
3. Any disclosure of information will be treated with utmost confidentiality and be assured that all persons involved in handling the case are also required to maintain the strictest level of confidentiality.

POLICY'S OBJECTIVE

SWG established the Whistleblowing Policy & Procedure (WBPP) with intention to provide an avenue for all employees and business partners as well as the members of the public to alert the organization to the fact that its stakeholders are being wrongfully harmed, or that they are at risk of harm.

WHISTLEBLOWING COMPLAINTS

Stakeholders can make a whistleblowing complaint if they are aware of any wrongdoings, or any action that fits whistleblowing definition, including but not limited to:

- a. Bribery
- b. Harassment and/or Sexual harassment
- c. Misappropriation of assets
- d. Abuse of power
- e. Fraud
- f. Acts or omission endangering individual's health or safety or any individual or significant danger to the environment
- g. Theft
- h. Noncompliance with the laws, regulations, regulatory requirements etc. or any acts or omission against the SWG's interests
- i. Attempt conceal information relating to improper conduct
- j. Criminal breach of trust
- k. Questionable and improper accounting
- l. Forgery
- m. Profiteering as a result of insider knowledge
- n. Misrepresentation or false statements to the staff or officer of SWG
- o. Violation of human rights
- p. Breach of SWG's policy
- q. Disclosure of company's information without proper authorization

CONFIDENTIALITY & ANONYMITY

All whistleblowing reports are treated with utmost confidentiality and or anonymously and without revealing the whistleblower's identity, to the extent permitted by law. The whistleblower is to be given an assurance that his/her identity will be only known to Managing Director on a need to know basis and for investigation purpose.

SCOPE OF REPORTING

The WBPP applies to all staffs and interns including other business associates and members of the public.

ANONYMOUS WHISTLEBLOWER

To ensure all reports are being investigated in fair and reasonable manner, the whistleblower is encouraged to disclose his/her personal details so that the process of obtaining more information on the allegation can be performed. This is also to ensure that the company are able to accord necessary protection to the whistleblower under this WBPP.

PROTECTION TO WHISTLEBLOWER

All whistleblowing reports shall be made with good faith in the best interest of the company and not for any personal gain of the employee whistleblower; otherwise, disciplinary action may be taken against the employee whistleblower.

This WBPP provides assurance that no action shall be taken against the employee whistleblower in accordance with section 368B of the Companies Act 1965 and the Whistleblower Protection Act 2010 and the employee whistleblower shall be protected against reprisals, adverse employment consequence, or retaliation and provided with immunity from disciplinary action from the whistleblower's immediate superior or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:

- a) The whistleblowing report is made in good faith with reasonable grounds and justification that the information and any allegation in it are true;
- b) The employee whistleblower does not make a false or misleading report knowingly, negligently, frivolously, or recklessly; and
- c) The whistleblowing report is not vexatious, made with malicious or ill will or made for any personal gain of the employee whistleblower.

REPORTING CHANNEL

Disclosure can be made via:

Report to

- a. Email
whistleblowing@sanwagroup.com.my

Address:

Attn: Managing Director Officer
No 1, Lebuhr Perusahaan Klebang 9,
IGB International Industrial Park,
31200, Chemor, Perak.

Please mark the envelope "Strictly Confidential.
To be opened by addressee ONLY."

*All disclosures will be treated in the strictest confidence