

WHISTLEBLOWING POLICY

1.0 Introduction

- 1.1 Kelington Group Berhad ('Kelington') is committed to achieving and maintaining high standards with regards to behaviour at work as set out in Kelington's Standard of Business Conduct.
- 1.2 In order to achieve the standards set in Kelington's Standard of Business Conduct, all employees and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.
- 1.3 Kelington views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.
- 1.4 The policy and procedures is applicable to all companies within Kelington Group.

2.0 Whistleblowing

- 2.1 Whistleblowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.
- 2.2 Only genuine concerns should be reported under Whistleblowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

3.0 Procedures

- 3.1 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 'Group Chief Executive Officer ('Group CEO')'. Channel of reporting to Group CEO are:

Name : Raymond, Gan Hung Keng
Email : raymond.gan@kelington-group.com
Telephone : +603 7845 5696

Mail : *Mark* **Strictly Confidential**

Kelington Group Berhad
No. 3 Jalan Astaka U8/83
Seksyen U8
Bukit Jelutong Industrial Park
40150 Shah Alam
Selangor Darul Ehsan

Attention: Mr Gan Hung Keng

- 3.2 In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name : Steven, Chan Thian Kiat
e-mail : ba.associate@gmail.com
Telephone : +6012 206 6618

Mail : *Mark* **Strictly Confidential**

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Attention : Chairman – Audit Committee

4.0 Action

- 4.1 All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group (e.g. Group Internal Audit, Group Human Resource Department, Company Secretary etc.). The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- 4.2 Reports received anonymously will be treated as confidential.
- 4.3 The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as it's permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
- 4.4 Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
- 4.5 Where possible, steps will also be implemented to prevent similar situation arising.

5.0 Further action

- 5.1 If for any reason, the person making the report is not satisfied with the way his report had been dealt with, he can escalate his report to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

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Attention : Chairman – Audit Committee

- 5.2 Chairman of Audit Committee will deliberate the report with his Committee members and decide on the appropriate course of action.