

RAMSSOL GROUP SDN BHD (201901001120 / 1310446-A)

WHISTLEBLOWING POLICY



RAMSSOLGROUP

RAMSSOL GROUP SDN BHD
Company No: 201901001120 / 1310446-A

INTERNAL REVIEW	NAME	SIGNATURE	DATE

<u>REVISION CODE</u>	<u>REVISION DESCRIPTION</u>	<u>ORIGINATOR</u>	<u>EFFECTIVE DATE</u>
Original	Original Issue		

RAMSSOL GROUP SDN BHD (201901001120 / 1310446-A)

WHISTLEBLOWING POLICY

ABBREVIATIONS

AC	-	Audit Committee
RAMSSOL / the Company	-	Ramssol Group Sdn Bhd
RAMSSOL Group	-	RAMSSOL and its subsidiary companies
BOD	-	Board of Directors
MACC	-	Malaysian Anti-Corruption Commission

RAMSSOL GROUP SDN BHD (201901001120 / 1310446-A)

WHISTLEBLOWING POLICY

Policy Statement

At Ramssol Group Sdn Bhd (“RAMSSOL” or “the Company”), we are committed towards achieving and maintaining the highest standard of integrity, transparency, accountability and work ethics in the conduct of business and operations.

This Whistleblowing Policy (“the Policy”) has been established to enable a whistle blower, both internally and externally, to report on any wrongdoing, corruption and instances of fraud, abuse and/or action that is potentially conflicting with the interests of the Company or RAMSSOL Group.

RAMSSOL encourages external parties and the employees of RAMSSOL Group to raise genuine concerns about improper conduct in accordance with the procedures as provided under this Policy and to report such allegations with reference to Whistleblower Protection Act 2010.

Objective of the Policy

The objective of this policy is to provide a channel for employees, agents, vendors, contractors, suppliers, consultants and customers of RAMSSOL as well as members of the public to disclose or highlight any improper conduct within RAMSSOL Group without fear of retaliation and to offer protection for such persons (especially to the employees of RAMSSOL Group) who report such allegations.

This policy is designed to provide a transparent and confidential process for dealing with concerns of all material aspects. As for employee, such concerns on any improper conduct should be reported to his or her superior as first port of call. If for any reason, such employee finds it difficult to report his or her concerns to a superior, the employee may report the concerns through the designated whistleblowing channels. This whistleblowing policy provides for the disclosure of information concerning any improper conduct within RAMSSOL Group through a dedicated internal channel.

RAMSSOL GROUP SDN BHD (201901001120 / 1310446-A)

WHISTLEBLOWING POLICY

Scope of the Policy

Improper conduct (misconduct or illegal acts) include, but not limited to, the following:

1. Fraud (embezzlement, theft and misappropriation) of RAMSSOL Group's funds or assets;
2. Bribery, corruption or money laundering;
3. Criminal breach of trust, abuse of power and position or blackmail;
4. Improprieties and irregularities in accounting and financial reporting;
5. Unauthorized disclosure or use of confidential information of RAMSSOL Group;
6. Conflict of interest within the meaning of RAMSSOL's conflict of interest policy;
7. Misuse of RAMSSOL Group's properties, assets or resources;
8. Non-compliance with RAMSSOL Group's policies and procedures or breach of internal control;
9. Acts or omissions which are deemed to be against the interests of RAMSSOL Group;
10. Non-compliance with laws, regulations, requirements of statutory bodies or public policies;
11. Danger to health and safety of any employee of RAMSSOL or any other individual;
12. Damage to the environment;
13. Sexual harassment;
14. An accomplice to or deliberate concealment of any or a combination of the above matters or other acts of wrongdoing;
15. Unethical behaviour; and
16. Other illegal acts or malpractices.

Protection to Whistleblower

With reference to Whistleblower Protection Act 2010, a whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. The identity of the Whistleblower shall be kept confidential to the extent possible unless otherwise required by law or for purposes of any proceedings by or against RAMSSOL. Whistleblower are cautioned that their identities may become known for reasons outside of the control of the Company. The identity and personal information of the Whistleblower may be revealed to persons involved in investigations or any other processes that are deemed necessary to assist investigations.

RAMSSOL GROUP SDN BHD (201901001120 / 1310446-A)

WHISTLEBLOWING POLICY

Protection to Whistleblower (Contd.)

In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within RAMSSOL Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts as well as the rules and procedures involved.

Protection will be accorded by RAMSSOL Group to the whistleblower who satisfies the following:

1. Only genuine concerns are reported, and the report is made in good faith and the whistleblower have reasonable grounds and does not provide false or misleading information knowingly, negligently or recklessly in the report;
2. Disclosure is not made with malicious intent or ill will;
3. Disclosure is not frivolous or vexatious; and
4. The report is not made for personal gain or agenda.

Any party that retaliates against someone who has reported improper conduct in good faith may be subject to appropriate action, up to and including legal action, where applicable. However, if allegations are proven to be malicious or not made in good faith, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

PROCEDURAL MATTERS

Procedures to Report on Improper Conduct

Whistleblowing Report should be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.

All Whistleblowing Report must be disclosed in accordance to the procedures set out under RAMSSOL's Whistleblowing Policy:

- (i) Whistleblowing Report can be made through ANY of the following reporting channels, in strict confidential manner:
 - a. Email to the Audit Committee at whistleblowing@ramssolgroup.com ;
 - b. In person to the Company Secretary; or

RAMSSOL GROUP SDN BHD (201901001120 / 1310446-A)

WHISTLEBLOWING POLICY

- c. In-writing to the Chairman of the Audit Committee of using a sealed envelope marked as “Confidential”.

Although verbal communication is acceptable, reports are encouraged to be made in writing, so as to ensure clear understanding and accuracy of the issues raised, and to prevent loss of or distorted facts and details through recollection solely based on memory and to facilitate the investigation process.

(ii) Investigation

- a) The authority to decide whether or not a Whistleblower Report should be investigated is vested with the Audit Committee, who will appoint the appropriate Investigator. A Whistleblower Committee is appointed by the Audit Committee to review all disclosures made and decide on the next appropriate course of action. The Whistleblower Committee is chaired by the Chairman of the Audit Committee and its members may consist of the Head of Human Resource Department and/or an appointed Legal Counsel and/or any other party deemed fit to add transparency and neutrality to the proceeding. Chairman of Audit Committee may appoint other personnel of suitable seniority or independent third party to investigate the allegations.
- b) The decision to conduct an investigation is by itself not an accusation and is to be treated as a neutral fact-finding process. The outcome of the investigation may not support the conclusion of the Whistleblower that an improper or unethical act has indeed been committed.
- c) Person identified in relation to an alleged act whom a Whistleblower Report has been made or evidence gathered during the course of an investigation (“the Subject(s)”) shall have a duty to co-operate with the Investigator during investigation to the extent that such co-operation sought does not merely require them to admit guilt.
- d) Subject(s) should not interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated.
- e) Unless there are compelling reasons not to do so, Subject(s) will be given the opportunity to respond to the material findings of the investigation. No allegation of wrongdoing against a Subject shall be considered as admissible unless there is good evidence in support of the allegation.
- f) Subject(s) have the right to be informed of the outcome of the investigation. If allegations are not sustained, the Subject should be consulted as to whether the disclosure of the investigation results would be in the best interest of him/her and the Company.
- g) The Whistleblower is accorded the privilege to request the outcome of his/her Whistleblower Report.

- END OF POLICY -