

SUNSURIA BERHAD
(Company No. 8235-K)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1. OVERVIEW

Sunsuria Berhad and its subsidiaries (“Sunsuria Group”) is committed to achieving and maintaining the highest standard of integrity, transparency, accountability and work ethics in the conduct of its business and operations. In line with the Sunsuria Group’s Integrity Policy, the Whistleblowing Policy (“the Policy”) has been established to enable employees and associates within Sunsuria Group to report any genuine concerns about misconduct, wrongdoings, corruption and instances of fraud, waste, and/or abuse that they encounter involving the interests of the Company (“Protected Disclosures”).

This Policy is to provide an avenue for all employees and associates of Sunsuria Group (“the Whistle-Blower”) to disclose any concerns about misconduct, wrongdoings, corruption and instances of fraud, waste, and/or abuse (“malpractices”) in accordance with the procedures as provided under this Policy and to provide protection for its employees and associates who report such allegations.

2. PROTECTION OF WHISTLE-BLOWER

- 2.1** No unfair treatment will be meted out to a Whistle-Blower by virtue of his/her having submitted a Protected Disclosure under this Policy. The Whistle-Blower shall be protected against reprisals or retaliation from the Management of the Company, and shall be granted immunity from any disciplinary action by the Whistle-Blower’s immediate supervisor or Head of Department or any other person exercising power or authority over the Whistle-Blower in his/her employment.

The identity of the Whistle-Blower shall be kept confidential to the extent possible unless otherwise required by law or for purposes of any proceedings by or against Sunsuria Group. Whistle-Blower are cautioned that their identities may become known for reasons outside of the control of the Company. The identity and personal information of the Whistle-Blower as well as the person implicated in the Protected Disclosure may be revealed to persons involved in investigations or any other processes that are deemed necessary to assist investigations.

Any other employee or person assisting in the said investigation shall also be protected to the same extent as the whistle-blower.

- 2.2** The protection will be accorded by Sunsuria Group only when the Whistle-Blower satisfies all the following conditions:-
- (i) the Protected Disclosure is made in good faith, does not contain any false or misleading information which was provided, knowingly, negligently or recklessly and is not made out of ill will or with malicious intention;
 - (ii) Whistle-Blower has reasonable grounds and factual evidence when reporting a wrongdoing; and

- (iii) the Whistle-Blower has NOT communicated the Protected Disclosure to any other party outside the established reporting channels.

While it will be ensured that genuine Whistle-Blowers are accorded protection from any kind of unfair treatment, any abuse of this protection can warrant disciplinary action. Protection under this Policy will not mean protection from disciplinary action arising out of false, frivolous, baseless or bogus allegations made by a Whistle-Blower knowingly. If the investigation later reveals that the Protected Disclosure was NOT made in good faith and is with malicious intent, the Whistle-Blower will be subject to disciplinary action by the Group in accordance with the Group's disciplinary policy in the Employee's Handbook.

3. ANONYMOUS WHISTLE-BLOWER

Any anonymous disclosure will not be entertained. Any employee or associates who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him.

4. SCOPE

This policy confines to those situations where a Whistle-Blower may need to make the necessary Protected Disclosures. As a guide, the types of malpractices concerned are listed on Appendix A of this Policy.

5. PROCEDURAL MATTERS

Procedures to Report on misconduct, wrongdoings, corruption and instances of fraud, waste and/or abuse

Protected Disclosures 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 Protected Disclosures must be disclosed in accordance to the procedures set out below under Sunsuria's Whistleblowing Policy:-

- (i) Protected Disclosures can be made through ANY of the following reporting channels, in strict confidential manner:-
 - (a) Email to whistleblower@sunsuria.com; or
 - (b) In person to the Head of Human Resources using the prescribed Whistle Blower Report Form; or
 - (c) In-writing to the Chairman of the Audit Committee of Sunsuria Berhad of Suite 8, Main Tower, Sunsuria Avenue, Persiaran Mahogani, Kota Damansara PJU 5, 47810 Petaling Jaya, Selangor using the prescribed Whistle Blower Report Form via a sealed envelope marked as "Confidential".

The Whistle Blower Report Form can be downloaded from Sunsuria information Portal at www.Live.Sunsuria.com or www.sunsuria.com.my. The Form will aid you in providing adequate information to the Head of Human Resources or Chairman of the Audit Committee.

(ii) Investigation

- (a) The authority to decide whether or not a Protected Disclosure should be investigated is vested with the Whistle-Blower Committee, who will appoint the appropriate Investigator. A Whistle-Blower Committee is appointed by the Audit Committee to review all disclosures made and decide the next appropriate course of action. The Whistle-Blower Committee is chaired by the Chairman of the Audit Committee and its members may consist of the Head of Human Resources 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 Whistle-Blower that an improper or unethical act has indeed been committed.
- (c) A person against or in relation to whom a Protected Disclosure 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 maintainable 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 Whistle-Blower is accorded the privilege to request the outcome of his/her Protected Disclosure.

If the case necessitates further action on the part of the Human Resource Department (HR), a copy of a summary of the report will be provided to HR.

The Head of HR will furnish a half-yearly report to the Audit Committee on the number and nature of cases reported by Whistleblower(s). The Audit Committee will review the report and submit a summary report to the Board of Directors for their information and/or action, where applicable. The report will maintain confidentiality to protect the Whistle-Blower's identity.

6. DECISIONS

If an investigation concludes that an improper or unethical act has been committed, the matter should be handled in accordance with the existing Disciplinary procedures as specified in the Employees' Handbook adopted by the Company.

All disclosures along with the results of the investigation relating thereto shall be retained by the Company for a minimum period of 7 years.

7. REVIEW OF POLICY

The Company will review the Policy periodically and discuss any changes that may be required and recommend any such changes to the Board for consideration and approval. Any revisions and amendments to this policy will be communicated to all employees of Sunsuria Berhad and its Group of Companies accordingly.

This Policy was approved by the Board of Directors on 18 December 2018.

This Policy will be published on the Company's website for public information.

As a guide, the type of malpractices covered under the Whistleblowing Policy include the following examples:

- (a) Theft, pilferage, misappropriation or attempt of the same of the Company's money or property.
- (b) Fraud, dishonesty, cheating, falsification or attempt of the same in connection with the Company's business, money or property.
- (c) Soliciting or accepting bribe or any illegal gratification.
- (d) Participating in unauthorised financial transactions.
- (e) Breach of fiduciary relationship.
- (f) Conflict of interest.
- (g) Spreading malicious rumours about the Sunsuria Group.
- (h) Gross negligence and neglect of duty.
- (i) Unauthorised disclosure of Company's confidential information, including commercial or manufacturing secrets, calculations or designs.
- (j) All forms of harassment including but not confined to unwelcome verbal or physical advances and sexually, racially or otherwise derogatory or discriminatory statements or remarks.
- (k) Commission of any subversive act.
- (l) Commission of any act that brings disrepute, embarrassment or affects the legitimate interest of the Company or ruins the image of the Company.
- (m) Habitual breach of any Company's order or any law applicable to the establishment of rules made thereunder.
- (n) Conduct which is likely to cause injury or endanger the life or safety of another person within the Company's premise.
- (o) Misrepresentation of the Company to the others.