

Leform Berhad

Whistleblowing Policy

THIS POLICY IS TO BE CIRCULATED AND COMPLY WITHIN THE GROUP ONLY

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1 Policy Statement

- 1.1 Leform Berhad (“**Company**”) is committed to uphold the values of transparency, integrity, impartiality and accountability expected of its employees within its group of companies (“**Group**”) and that from its contractors, consultants and any other individuals or organization who have dealings with the Group. It encourages and enables employees and others to raise legitimate concerns to be investigated and addressed within the Group prior to seeking resolution outside the Group. In line with this, the Company has adopted the Whistleblowing Policy (“**Policy**”) that sets out the mechanism and framework by which employees and other stakeholders who have dealings with the Group can confidently voice concerns / complaints in a responsible manner without fear of discriminatory treatment.
- 1.2 The key provisions in this Policy have been aligned with the Whistleblower Protection Act 2010, Companies Act 2016, Malaysian Anti-Corruption Commission Act 2009 and all applicable laws and regulations in Malaysia. This Policy shall be read together with the Company’s Anti-Bribery and Anti-Corruption Policy.

2 Objectives

- 2.1 This Policy is designed to facilitate the Company’s employees and other stakeholders to raise genuine concerns of any improper conduct (as defined below) without being subject to victimisation, harassment or discriminatory treatment, and to have such concerns properly investigated. This will strengthen the accountability and transparency in the business affairs of the company while enhancing sound governance.

3 Definition

- 3.1 “**External Party**” means a person who has a business relationship with the Group, including customers, suppliers, contractors, agents and applicants for employment, and the general public.
- 3.2 “**Improper Conduct**” is any conduct which if proven, constitutes a disciplinary offence or a criminal offence and includes but not limited to the following:
 - (a) Criminal offence or unlawful act such as fraud, theft, embezzlement and blackmail;
 - (b) Bribery and corruption practices;
 - (c) Forgery or alteration of any document or account belonging to companies within the Group;
 - (d) Forgery or alteration of a cheque, bank draft, or any other financial document;
 - (e) Misappropriation of company’s funds, securities, supplies, or other assets;
 - (f) Impropriety in the handling or reporting of money or financial transactions;
 - (g) Profiteering as a result of insider knowledge of the Group’s activities;
 - (h) Any conduct which is an offence or a breach of law;
 - (i) Financial malpractice;
 - (j) Breach of the Group’s policies and guidelines;
 - (k) Improprieties of tender and procurement activities;
 - (l) Abuse of power and position for personal gain;

- (m) Any act that poses danger to health and safety;
- (n) Any act that causes damage to environment; and
- (o) Concealment of any of the above.

The list of Improper Conduct under this section is not exhaustive and shall include any other act or omission, which if proven, will constitute an act of misconduct pursuant to the Group's Misconduct & Disciplinary Action Policy and/or a criminal offence under the relevant law in force.

- 3.3 **"IO"** means Investigating Officer appointed to carry out investigation on the complaint or disclosure by the whistleblower.
- 3.4 **"Whistleblowing"** means when an employee or External Party raises a genuine concern about a dangerous or illegal activity or Improper Conduct that he / she is aware of through his / her work dealings.
- 3.5 **"Whistleblower"** may refer to the employee or External Party who discloses or reports the Improper Conduct.

4 Scope

- 4.1 The Policy applies to the whole Group. All employees (whether permanent, contract, part-time or casual), directors, and External Party with or without a business relationship with the Group are encouraged to report genuine concerns in relation to Improper Conduct in the Group.
- 4.2 This Policy does not, however, cover any issues, complaints or concerns in relation to:
 - (a) matters which are trivial or frivolous in nature;
 - (b) matters which are motivated by malice;
 - (c) matters pending or determined through the Company's disciplinary proceedings; and
 - (d) matters pending or determined through any tribunal or authority or court, arbitration or other similar proceedings.
- 4.3 If an employee is unsure whether a particular act or omission constitutes Improper Conduct under this Policy, he or she is encouraged to seek advice or guidance from the immediate superior or Head of Department, or the Head of the Human Resource Department.

5 Confidentiality and Protection for Whistleblower

- 5.1 Every effort will be made to treat the whistleblower's identity with appropriate regard to confidentiality. The identity of the whistleblower will be protected at all times unless disclosure is required by law, for purposes of any proceedings by or against the Group or for purpose of investigation.

- 5.2 This Policy provides assurance that the whistleblower, is an employee of the Company, shall be protected against retaliation and immunity from disciplinary action from the whistleblower's immediate supervisor or department/division head or any other person exercising power or authority over the whistleblower in his/her employment.
- 5.3 However, protection under Clause 5.1 and 5.2 above will be accorded to the whistleblower only when the whistleblower satisfies all the following conditions:
- (a) The disclosure is done in good faith;
 - (b) The whistleblower genuinely believes that the information and any allegations disclosed are true;
 - (c) The whistleblower has not communicated the disclosure to any other party not related to the disclosure; and
 - (d) The disclosure made is not for personal gain or interest.
- 5.4 The Company may revoke the protection accorded to a whistleblower making a report in bad faith or based on unfounded allegations or containing trivial and malicious claims and may take appropriate disciplinary actions against the same.

6 Whistleblowing Channel and Procedures

- 6.1 A whistleblower shall compile any information or document(s) that he or she, in good faith, genuinely believes in and discloses an Improper Conduct, which is likely to happen, is being committed or has been committed.
- 6.2 Procedure to be followed for reporting Improper Conduct is as follow:
- (a) In order for the Company to investigate the Improper Conduct, the whistleblower is to provide the following particulars in the report:
 - (i) particulars of whistleblower such as name, NRIC No., designation and contact particulars (email, telephone or mobile number and/or address);
 - (ii) details and description of the Improper Conduct, including, its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if the whistleblower is not able to identify the identity of the person(s) involved; and;
 - (iii) particulars of witnesses and/or production of documentary evidence, if any.
 - (b) Disclosures in relation to Improper Conduct is to be reported to the Chairman of Audit and Risk Management Committee via email: complaints_ceo@leformgroup.com.my
 - (c) For employment-related matters, the disclosures can be made to the Managing Director ("MD") via email :ktlaw@leformgroup.com.my by the employee whereby Clauses 5 and 6 shall be applicable to the extent of its relevancy.

Disclosures must be in writing and emailed to the respective email address together with the documentary evidence. Alternatively, disclosures can also be forwarded in a sealed envelope

marked “Confidential” and “Strictly to be opened by the MD or Chairman of Audit and Risk Management Committee” to the Company’s registered address via registered post.

- 6.3 The Company shall not entertain any anonymous whistle-blowing. However, the Company reserves the right to investigate any anonymous report. The whistleblower shall disclose his/her personal identity in the form attached.

7 Investigation

- 7.1 To facilitate due and fair investigation process, any person who discovers or suspects any Improper Conduct within the Group, should not attempt to conduct investigations personally or interrogate any suspect.
- 7.2 The Chairman of Audit and Risk Management Committee shall appoint personnel from management or Internal or External Auditor of the Company to conduct further investigations or review the report. The appointed personnel shall be referred to as “IO” and he/she shall be impartial and independent of all parties concerned. The IO is required to report all relevant findings, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the MD or Chairman of Audit and Risk Management Committee.
- 7.3 In instances where the IO is appointed from within the Company, the IO must be an employee of a Designation and/or Grade higher than the employee(s) implicated in the Improper Conduct.
- 7.4 In cases where the report involves the MD, the Chairman of Audit and Risk Management Committee may engage an independent third party as IO to investigate the allegations;
- 7.5 The appointed IO may conduct interviews with any relevant witnesses and shall use his best endeavours to gather all data and materials relevant to the Improper Conduct disclosed. The IO shall have absolute discretion to allow any assistance to the witness during the interview, subject to a request made by the witness.
- 7.6 At the conclusion of the investigation, the IO will submit an Investigation Report (“IR”) of the findings to the MD. In the event the report involves the MD, the report shall be submitted to the Chairman of the Audit and Risk Management Committee.
- 7.7 Whenever practicable, the IO may include in the IR for the following:
- (a) The steps or recommendations that need to be taken by the Group to prevent the Improper Conduct from continuing or re-occurring in future; and
 - (b) Any further action to be taken by the Group in respect of the Improper Conduct. The further action includes initiating disciplinary proceedings, and referring the matter to the appropriate external authority.
- 7.8 In the event the MD has reviewed and satisfied that from the findings and recommendations made in the IR, an Improper Conduct has been established against the suspect, then a final report

together with recommendation of the MD will be tabled to the Audit and Risk Management Committee. The Audit and Risk Management Committee will review the final report and decide corrective measures and/or disciplinary action to be taken against the wrongdoer.

- 7.9 The Audit and Risk Management Committee may also arrange a discussion or an interview with the whistleblower without the presence of IO (if IO is not an independent third party), if necessary.
- 7.10 Besides, if the IO conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.
- 7.11 In the case where the Chairman of Audit and Risk Management Committee reviewed the investigation and made a determination whether the allegation was substantiated or not, a final report together with the recommendations of the Audit and Risk Management Committee will be tabled at the Board of Directors. The Board of Directors will review the final report and decide corrective measures and/or disciplinary action to be taken against the wrongdoer.
- 7.12 Subject to any prohibition in law or any legal requirements, the Chairman of Audit and Risk Management Committee will inform the whistleblower that the investigation has been completed and the findings have been presented to the Audit and Risk Management Committee or the Board of Directors as the case may be. As the findings are confidential, the details of the findings will not be disclosed to the whistleblower.

8 Record Retention

- 8.1 The MD / Chair of Audit and Risk Management Committee must ensure all reports received from whistleblower and documents related to the same are being properly maintained and shall be kept confidential.
- 8.2 All such documents shall be retained for at least 7 years.

9 Review of Policy

- 9.1 The Board and senior management of the Company will review the Policy from time to time when deemed necessary or at least once every 3 years and communicate the new changes to all relevant parties.
- 9.2 The Policy shall be made available on the Company's website.
- 9.3 This Policy was approved and adopted by the Board on 22 February 2022.