



PUNCAK NIAGA HOLDINGS BERHAD'S WHISTLE BLOWING POLICY 2019

1. INTRODUCTION

As a responsible corporate citizen, Puncak Niaga Holdings Berhad ("the Company" or "Puncak Niaga") is totally committed to upholding the highest standards of transparency, accountability and integrity in the conduct of our business activities in the best interests of our stakeholders, including our employees.

Puncak Niaga's Whistle Blowing Policy aims to create a conducive workplace that is based on trust, honesty, openness and transparency and we are determined to eradicate unethical practices at the workplace.

The primary objective of Puncak Niaga's Whistle Blowing Policy is to encourage our employees within the Puncak Niaga Group to disclose internally and at a high level, any wrongdoings, malpractices or misconducts (whistle blowing) of which they become aware and to provide protection for our employees who report allegations of such wrongdoing(s), malpractice(s) or misconduct(s).

2. POLICY

The Company and the Group shall endeavour to undertake the following :-

- (i) To ensure that all allegations are thoroughly investigated and appropriate action taken, where necessary.
- (ii) A whistle blowing employee will be protected against adverse employment actions (discharge, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of business misconducts.
- (iii) If an employee makes an allegation in good faith, which is not confirmed by subsequent investigations, no action will be taken against the said employee.
- (iv) Employees who participate or assist in an investigation will also be protected.
- (v) The Company will make every possible effort to protect the anonymity of the whistle blower.



- (vi) In making a disclosure, an employee is expected to exercise due care to ensure the accuracy of the information given. If, however, an employee makes malicious or false and unsubstantiated allegations to the detriment of other individual(s), the Company reserves the right to take disciplinary action against the said employee.
- (vii) An employee shall not use the Policy to question any financial or business decisions made by the Company or the Group or to use the Policy as an avenue to request the Company or the Group to reconsider any other matters which have already been addressed by the Company or the Group under other existing policies and procedures.

3. **EXAMPLES**

Some examples of business misconducts include, but are not limited, to the following:-

- A criminal offence.
- The use of deception to obtain an unjust or illegal financial gain, either for the business unit or personally.
- Intentional misrepresentations directly or indirectly affecting the Company's and the Group's financial statements.
- A failure to comply with any legal obligations or with laws or regulations.
- A miscarriage of justice.
- Danger to the health and safety of any individual.
- Damage to the environment.
- A serious and/or deliberate breach of fundamental internal controls, policies and/or procedures.
- Serious non-professional or non-ethical conduct or behaviours such as fraud, corruption, bribery, misappropriation, dishonesty or blackmail.
- Misuse/abuse of position or information for personal gain.
- The deliberate concealment of any information in respect of the above.



4. PROCEDURES

- Complaints of an employee should be raised with the employee's line manager who will then notify one of the Designated Directors of the Group.
- However, if for some reason the employee does not feel comfortable to report through his or her line manager, then he or she has the right to bypass the line management structure and take his or her concerns directly to the Group's Designated Directors or the Chairman of the Audit Committee of Puncak Niaga .
- All complaints must be raised in writing and should include full details and if possible, supporting evidence, and should state that the complaints are made under the Whistle Blowing Policy.
- Anonymous complaints shall not be entertained.
- All incidences of whistle blowing in Puncak Niaga and Puncak Niaga Group shall to be reported to the Executive Director, Human Resources & Administration Division who shall investigate and submit the report and findings recommendation to the Executive Committee ("EXCO") of Puncak Niaga for deliberation. This report shall then be sent to the Executive Director, Corporate Services Division.
- The Executive Director, Corporate Services Division shall collate and report all incidences of whistle blowing in Puncak Niaga Group to the Audit Committee and Board of Puncak Niaga at the relevant meetings of the Audit Committee and Board of Directors, where applicable.
- The Audit Committee of Puncak Niaga has the responsibility of overseeing the Whistle Blowing Policy.
- The list of the Designated Directors of the Group for Puncak Niaga's Whistle Blowing Policy is as per "Appendix I". This Appendix I is subject to update from time to time due to changes in personnel holding the named designations, where applicable.



APPENDIX I

DESIGNATED DIRECTORS OF THE GROUP FOR WHISTLE BLOWING POLICY

Chairman of Audit Committee

YBhg Dato' Sri Adenan Ab. Rahman, Independent Non-Executive Director

Directors

1. YBhg Tan Sri Rozali Ismail, Executive Chairman
2. Encik Azlan Shah Tan Sri Rozali, Managing Director
3. Mdm Tan Bee Lian, Executive Director, Corporate Services Division
4. Puan Faridatulzakiah Mohd Bakhry, Executive Director, Human Resources & Administration Division