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PURPOSE

The Whistleblowing Policy ('the Policy') is intended to directly support the Group's Core Values, Code of Ethics and Governance requirement. Unitrade Industries Berhad ("UIB" or the "Company") and its subsidiaries (collectively referred to as the "Group") places high value on the level of trust and integrity expected of its employees. It is an avenue to encourage and enable employees and others to raise legitimate concerns to be objectively investigated and addressed within the Group prior to seeking resolution outside the Group.

In line with this, the Group has adopted the Policy that outlines the Group's commitment to ensure that employees and other stakeholders are able to raise genuine concerns in relation to breach of a legal obligation, miscarriage of justice, danger to health, safety and environment at the earliest opportunity without being subject to victimisation, harassment or discriminatory treatment, and to have such concerns properly investigated. The Policy sets out the mechanism and framework by which employees, contractors, consultants and any other individuals or organisation who have dealings with the Group can confidently voice concerns / complaints in a responsible manner without fear of discriminatory treatment.

SCOPE

The Policy applies to the Group. All employees (whether permanent, contract, part-time or casual), Directors, Shareholders, Consultants, Vendors, Contractors, external agencies or any parties with a business relationship with the Group are encouraged to report genuine concerns in relation to breach of a legal obligation, miscarriage of justice, danger to health, safety and environment.

DEFINITIONS

Whistleblowing – This occurs when an employee/other stakeholder raises a genuine concern about a dangerous or illegal activity or improper conduct that he/she is aware of through his/her work/dealings.

Whistleblower – The employee / other stakeholder who discloses or reports the wrongdoing.

POLICY

The Policy serves as a tool in preventing misconduct at the beginning stage.

The Group encourages the employees / other stakeholders to make any disclosures openly and honestly and that concerns / complaints raised will be treated fairly.

All disclosures made under this Policy will be dealt with in a confidential manner. Disclosures received under anonymity will not be entertained to prevent invalid malicious reporting, poison letters, exploitation and victimisation.

The Whistleblower is required to identify himself / herself and provide contact information in his / her report. This will facilitate the investigator to obtain further information, if required and communicate on results of investigation to the Whistleblower.

IMPROPER CONDUCT

The following shall constitute “Improper Conduct” under this Policy:

- Incidents of fraud, corruption or bribery;
- Conduct or activity which breaches any law or regulatory obligation;
- Breach of the Group’s policies, practices, procedures or other rules of conduct;
- Improprieties in matters of financial reporting; and
- Situation which poses a danger to health, safety of any individual or significant danger to the environment

(Other improper conducts as provided in the following Appendix 1)

COMMUNICATION CHANNEL TO COMMITTEE

a) Disclosure of information should initially and promptly be made by the Whistleblower to one of the following persons in the Whistleblowing Committee:

- Dato’ Abdul Majit Bin Ahmad Khan (Independent Non-Executive Chairman)
- Mr. Naventhran Paul (Head of Human Resources of the Group)
- Mr. Stephen Koh Sui Ming (Compliance Officer/CFO)

COMMUNICATION CHANNEL

- b) Report or disclosure under this Policy can be made through e-mail to ak_majid@yahoo.com and whistleblowing@unitrade.com.my, or by post (using the attached form as per Appendix 2) addressed to the above persons. The details are as follows:

Mailing Address: **Unitrade Industries Berhad** c/o Registered Office
 12th Floor, Menara Symphony, No. 5, Jalan Prof. Khoo Kay Kim
 Seksyen 13, 46200 Petaling Jaya, Selangor Darul Ehsan

- c) Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

REQUIRED EVIDENCE

- a) The Whistleblower should be able to provide the disclosure in writing, information regarding the type of activity or conduct, identity of the person(s) suspected as being involved, when it occurred and who was affected.
- b) The Whistleblower must have first-hand knowledge or information of the facts, i.e. information obtained from third party or 'hearsay' will not be entertained. However, the Whistleblower should not be discouraged from making a report because they are unsure whether there is sufficient evidence to support their allegations.

CONFIDENTIALITY & PROTECTION

- a) A Whistleblower must identify himself / herself when submitting a complaint / disclosure. Upon making the disclosure in good faith:
- The Whistleblower will be protected from any reprisal within the Group as a direct consequence of the disclosure. ('Reprisal' means disciplinary measures, demotion, suspension or termination of employment or service);
 - Any form of retaliation against individuals who have reported a wrongdoing or who have facilitated with the investigations is a breach of the principal obligation of all staff members to uphold the highest values and integrity.

CONFIDENTIALITY & PROTECTION

- The Whistleblower's identity shall be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against the Group;
 - The identity and personal information of the Whistleblower and the alleged wrongdoer may be revealed to persons involved in the investigations or any other process.
- b) Protection will be accorded by the Group only when the Whistleblower satisfies all the following conditions:
- The disclosure is done in good faith;
 - The whistleblower is aware that the information and any allegations disclosed are true;
 - The whistleblower has not communicated the disclosure to any other party not related to the disclosure;
 - The disclosure made is not for personal gain or interest.
- c) The Whistleblower will be protected under the **Whistleblower Protection Act 2010** ('the Act') if he or she makes a disclosure in good faith to an enforcement agency as per the Act. If a Whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimisation, as a consequence of Whistleblowing, he may consult or report to the enforcement agency.
- d) The Whistleblower and the alleged wrongdoer will be treated fairly. The Whistleblower will be informed of the status of his disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation).
- e) The Group views seriously any false, malicious or defamatory allegation. This can be considered as gross misconduct where appropriate disciplinary action may be taken by the Group.
- f) Suppliers/ Vendors of the Group and members of the public who become a Whistleblower will also be protected by the Group as to his/her/its identity subject to satisfying all conditions above.
- g) Employee and industrial relations related issues and human resources related issues are excluded from the operation of this Policy because they are other established mechanisms to raise such complaints.

PROCEDURES

- a) The Committee shall evaluate the nature and severity of the reported conduct and determine appropriate actions to be taken, including but not limited to, analysing the allegation and evidence provided, determining investigation approach and steps, conducting investigations, drafting investigation reports, and proposing remediation measures.
- b) When the reported conduct implicates Group Executives (anyone with a title of Director, Head of Department (“HODs”) and above, such as, MD, ED, CFO, COO, other C-Suites, HODs), the Committee shall escalate the matter to the Audit Committee/Whistleblowing Committee, whichever applicable, and determine the appropriate actions in consultation with the Audit Committee.
- c) When the reported conduct implicates a Committee member, the Committee member shall be recused from consideration of the report and a temporary substitute Committee member shall be appointed by the Audit Committee to assist in processing the report. The implicated Committee member can be reinstated once the investigation is concluded if deemed appropriate by the Board of Directors (“BOD”), Whistleblowing Committee or the Audit Committee.
- d) In determining the appropriate actions, the Committee shall consider all factors that are appropriate under the circumstances. Any investigative activity required shall be conducted in a manner that is legitimate, confidential, fair and objective, regardless of the alleged wrongdoer’s position, length of service, or relationship with the Group.
- e) When the reported conduct implicates an investigator assigned on this case, the committee shall assign an independent investigator or investigation team to take over the case in concern.

REPORTING

Upon conclusion of the investigation, the Head of Whistleblowing Committee (or other assigned investigator) will present the outcome of the investigation to the Board of Directors.

ACTION SUBSEQUENT TO REPORT

If the Board of Directors is satisfied with the outcome of the investigation, it will communicate to Chairman/Executive Vice Chairman to proceed with action based on established policy and procedures for the necessary disciplinary action to be taken immediately. Instituting the disciplinary action will be the responsibility of Head of Human Resource of the Group. If the misconduct involves breach of statutory provisions, official report should be made to the relevant regulatory authorities.

Senior Management must also take into account recommendations contain in the investigation report to prevent the conduct from continuing or occurring in the future. Actions to be taken may also be directed to remedy any harm or loss arising from the conduct.

REVIEW OF THIS POLICY

The Board of Directors can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulation and/or accommodate organisational changes within the Group. However, the modification made shall be effective after the same is circulated to employees in writing or electronically.

APPENDIX 1

List of Complaints under Whistleblowing Policy

The list of complaints / concerns includes, but are not limited to;

- Corruption or bribery
- Breaching of legal obligation
- Misuse of company information
- Any dishonest or fraudulent act
- Negligence in carrying out work obligations
- Any act of conflict of interest with suppliers, vendors or contractors
- Forgery or alteration of any document or account belonging to the Group
- Forgery or alteration of a cheque, bank draft or any other financial document
- Misappropriation or theft of funds, supplies or other assets
- Providing or accepting gifts or material value to/from customers, contractors, vendors or other persons doing or attempting to do business with the Group that are intended to influence a business decision or selection process
- Destruction, removal or inappropriate use of the Group's records, furniture, fixtures and equipment
- Falsifying payroll records or overtime claims
- Falsifying travel and entertainment expenses and/or utilising company funds to pay for personal expenses
- Fictitious reporting or receipts, delivery orders, etc. from suppliers or shipment to customers
- Misappropriation of computer hardware, software, data, etc.
- Acceptance of fictitious quotations from suppliers, vendors or contractors in favoring for a particular entity
- Inventory or asset theft
- Impropriety (including financial and operational, etc. within the Group)
- Gross mismanagement within the Group (including serious potential breach to the interest of society and environment)
- Breach of code of ethics of the Group, including sexual, physical or other abuse of human rights
- Act and omission which jeopardises the health and safety of the Group's employees or the public
- Any other detrimental wrongdoing which nature of the wrongdoing is subject to absolute discretion of the Committee

APPENDIX 2

WHISTLEBLOWING FORM

WHISTLEBLOWING REPORT		
To _____ :		
Incident Date & Time	Date : _____	Time : _____
Incident Location		
Name of alleged person / Div / Dept		
Description / Circumstances of alleged incident (Please use attachment if necessary)	<ul style="list-style-type: none"> • <i>What, Who, When, Where, How, Witness</i> • <i>Please provide evidence to support the claim</i> 	
Signature : _____ Name : _____ Dept/Div./Co : _____ Telephone No : _____ Date : _____		

Note: It is necessary to provide your name and contact number so that we can contact you for additional information of the reported concern.