

EG INDUSTRIES BERHAD [222897-W]

WHISTLEBLOWING POLICY

1. POLICY STATEMENT

EG is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognising the abovementioned values EG provides avenue for all employees of EG and members of the public to disclose any improper conduct within EG.

2. OBJECTIVE OF THE POLICY

This policy is to provide an avenue for all employees of EG and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

3. SCOPE OF POLICY

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the followings:-

- a) Fraud;
- b) Bribery;
- c) Abuse of Power;
- d) Conflict of Interest;
- e) Theft or embezzlement;
- f) Misuse of Company's Property;
- g) Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under EG's Code of Conduct and Business Ethics (CoBE) or any criminal offence under relevant legislations in force.

This policy is not to invalidate the Grievance Procedure and/or the Disciplinary Action Process and Procedures (DAPP) but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company. The given procedures as reflected shall be operative based on the purpose and objective of their existence.

4. APPLICABILITY OF THE POLICY

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of EG and its subsidiaries. This policy also applies to members of the public, where relevant.

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WHISTLEBLOWING POLICY (cont)

5. PROCEDURE IN MAKING A DISCLOSURE

All disclosures are to be channelled in accordance with the procedures as provided under this policy.

6. PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. 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 EG, 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 he whistleblower is mistaken as to the facts and the rules and procedures involved.

7. ANONYMOUS WHISTLEBLOWER

Any anonymous disclosure will not be entertained. Any employee or member of the public 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. However, the Company reserves its right to investigate into any anonymous disclosure.

8. NOTIFICATION

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

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PROCEDURES OF EG WHISTLEBLOWING POLICY FOR MEMBERS OF THE PUBLIC

Any employee or member of the public who has knowledge or aware of any improper conduct (misconduct or criminal offence) committed or about to be committed within EG Group is encouraged to make disclosure by following the procedures as stated in this document.

1. REPORTING CHANNELS

- Email to _____
- Online submission through website (e-form)
- In person to Head of HR Department using the prescribed Whistleblowing Form
- In writing to EG Whistleblowing Committee, (address)
- Hotline at _____ from Monday to Friday during office hours (9 am to 5 pm)

2. DISCLOSURE OF IDENTITY

In order to enable the Company to accord the Whistleblower with the necessary protection under the Policy and also to obtain more details pertaining to the disclosure, the Whistleblower is required to disclose his/her personal details as follows:-

- a) Name:
- b) NRIC No.:
- c) Contact Details: Office Contact / Mobile / Home

3. SCOPE OF REPORTING

Any improper conduct (misconduct or criminal offence) including but NOT limited to the followings:-

- a) Fraud
- b) Bribery
- c) Abuse of Power
- d) Conflict of Interest
- e) Theft or embezzlement
- f) Misuse of Company's Property
- g) Non Compliance to Procedure

Only genuine concern should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from any malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.

If the investigation later revealed that the disclosure was made with malicious intent, appropriate action can be taken against the Whistleblower.

The Whistleblower who wishes to withdraw his/her disclosure is required to write to the relevant Reporting Channel and provide reason(s) for the withdrawal. Nevertheless, the Company reserves the right to proceed with investigation on the subject matter of the disclosure.

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**PROCEDURES OF EG WHISTLEBLOWING POLICY FOR MEMBERS OF THE PUBLIC
(cont)**

4. CONTENT OF DISCLOSURE

Any disclosure made herein should contain the following information:-

- a) Details of the person(s) involved
- b) Details of the allegation:-
 - Nature of the allegation
 - Where and when the alleged misconduct/wrongdoing took place
- c) Other relevant information; and
- d) Any supporting evidence if available.

5. PROTECTION ACCORDED TO THE WHISTLEBLOWER

A Whistleblower will be accorded with protection under the Policy 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 and the rules and procedures involved.

The protection to the Whistleblower can be revoked under the following circumstances, among others:-

- a) The Whistleblower participated in the improper conduct;
- b) The Whistleblower wilfully discloses a false statement;
- c) The disclosure is made with malicious intent; or
- d) The disclosure is frivolous or vexatious.

6. NOTIFICATION ON THE OUTCOME OF THE DISCLOSURE

The Whistleblower will be notified on the outcome of his/her disclosure.