

HTVB POLICY				
COMPANY	HTVB	POLICY NO:	HTVB/POL/GHRD/019	REV
DEPARTMENT	GHRD	LAST REVISION DATE		
DATE OF ISSUE	18 March 2019	EFFECTIVE DATE		
PREPARED BY	Issac Teoh	TOTAL NO OF PAGES	Page 1 of 6	
APPROVED BY	ED / COO		(GHRD)	

WHISTLEBLOWING POLICY

1.0 PURPOSE

- 1.1 This Whistleblowing Policy is intended to support the Company's Core Values, Code of Ethics and Governance.
- 1.2 Hiap Teck Venture Berhad places great importance on trust and integrity amongst its employees and is committed to conduct our business activities with integrity, in accordance with the law and to the highest ethical standards.
- 1.3 This Whistleblowing Policy aims to
- 1.3.1 establish a robust, transparent and accountable communication channel for our employees and stakeholders to raise legitimate concerns in an effective, responsible and secured manner when they become aware of actual or potential wrongdoings that will cause us to fall short of our social and corporate responsibilities; and
 - 1.3.2 enable us to take swift, fair and objective corrective actions that will enable us to comply with our social and corporate responsibilities and maintain the support and trust of our employees and stakeholders.

2.0 DEFINITIONS

- 2.1 In this Whistleblowing Policy, the following terms have the following definitions:

“Code of Conduct” means the HTVB Code of Conduct;

“Employee” means all board of directors, executive officers, members of management, regular employees and contracted employees having employment relationship with our company, as well as temporary staff and seconded employees working under the control and supervision of our company;

“Employee Grievances” applies to personal dissatisfaction or complaints by Employees that are related to their employment and working conditions;

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“Stakeholders” means third party suppliers, contractors, agents, consultants, distributors, customers and such other business partner which has direct or indirect business dealings with our company;

“Whistleblowing Governance Group” shall have the meaning described in Section 4.2;

“Whistleblowing Investigation Team” shall have the meaning described in Section 5.1;

“Whistleblowing Policy” or “Policy” means this Whistleblowing Policy, including any subsequent revisions and supplemental guidelines;

3.0 COPE AND APPLICATION

- 3.1 This Policy encourages and enables our employees and stakeholders acting in good faith to raise legitimate concerns and disclose actual or potential wrongdoings or misconduct in our company. These wrongdoings or misconduct include but are not limited to (i) violation of laws and regulations, (ii) unethical behavior or breach of Code of Conduct, (iii) giving, solicitation or acceptance of bribes, (iv) acts that adversely affect the interests or values of shareholders and Stakeholders, (v) unauthorized disclosure or sale of company information, (vi) falsification of reports or documents, (vii) fraud, theft, embezzlement or misuse of company assets, (viii) improper or undesirable personal behavior or misdeeds which seriously impacts our company’s business or reputation, (ix) sexual or other forms of harassment in the workplace; and (x) attempts to cover any of the aforementioned.
- 3.2 Employees and/or stakeholders who raise legitimate concerns in good faith in accordance with this Policy are protected from reprisals within the limits of the law and assured that all reported cases will be objectively investigated and appropriate remedial measures taken where warranted. This Policy is not intended to restrict or otherwise govern legal rights and obligations which the employees and stakeholders have, or may have, in relation to the subject matter of the whistleblower report.
- 3.3 This Policy is not intended for employees to lodge Employee Grievances or appeal on disciplinary procedures. Employees can report Employee Grievances or lodge appeals on disciplinary procedures through our company’s human resources department.

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- 3.4 Employees and stakeholders should exercise due care to ensure that the information in their whistleblower report is accurate and truthful. No action will be taken against employees or stakeholders who make an allegation in good faith which is not confirmed by subsequent investigation. But this protection may be revoked if employees and stakeholders misuse or abuse the Policy by making false, frivolous, malicious or vexatious allegations.

4.0 HOW TO MAKE A WHISTLEBLOWER REPORT

- 4.1 Employees and stakeholders should report their legitimate concern at the earliest opportunity so that investigation and corrective action can be taken as soon as possible.
- 4.2 The monitoring and execution of the Policy will be placed under the supervision of the Whistleblowing Governance Group comprising the following:
- (i) Members of our company's Audit Committee;
 - (ii) Executive Director of our company; and
 - (iii) Human Resources Department
- 4.3 The Audit Committee Chairman shall be the chair for the meeting of the Whistleblowing Governance Group where a quorum of no less than two (2) members are present and in his absence, another member of the Audit Committee shall be the chair.
- 4.4 Where any member of the Whistleblowing Governance Group is the subject of the investigation, the member will be recused from attending any meeting of the Committee.
- 4.5 Employees and stakeholders have the option to make whistleblower reports in strict confidence through any of the following channels:

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Reporting Mode	Contact Details
Letter	Hiap Teck Venture Berhad Lot 6096, Jalan Haji Abdul Manan, Batu 5 ½ Jalan Meru 41050 Klang, Selangor Attention : Whistleblower Committee
Online Submission	Whistleblower Report Form XXX@htgrp.com.my

- 4.6 Employees and stakeholders making a whistleblower report should disclose in writing their (i) full name, (ii) NRIC and/or Employee Number (if applicable), as well as (iii) contact details such as telephone number and email address. This will enable our company to accord the person making the whistleblower report the necessary protection under this Policy and also obtain more details pertaining to the whistleblower report.
- 4.7 Reports may be made on an anonymous basis. However, natural justice usually requires that the details and identity of the employee or stakeholder submitting the whistleblower report be disclosed in any disciplinary investigation or action to be taken against the person(s) who is a subject of the complaint in the whistleblower report. Anonymous whistleblower reports will therefore be considered at the discretion of the Whistleblowing Governance Group. In exercising this discretion, the Whistleblowing Governance Group will consider (i) the seriousness of the issues raised, (ii) credibility of the whistleblower report, and (iii) likelihood of confirming the allegation from the relevant sources.
- 4.8 Whistleblower reports should include in writing the following disclosures: (i) background and history of the concern (giving relevant dates), (ii) reason for the concern, and (iii) identity of the person(s) committing the alleged wrongdoing. Insufficient details in the whistleblower report may impede the investigation and resolution of the concerns raised.
- 4.9 The Whistleblower must have first-hand knowledge or information of the facts. Any whistleblower report based of rumors, hearsay or information from third party will not be entertained.

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5.0 WHISTLEBLOWER INVESTIGATION

- 5.1 Upon receipt of the whistleblower report, the Whistleblowing Governance Group will as soon as practicable establish a Whistleblowing Investigation Team comprising appropriate and suitably qualified personnel to investigate the concerns disclosed in the whistleblower report in a fair and objective manner and at its discretion, consider involving any other or additional officer on the Company and/or Committee and/or an outside agency for the purpose of investigation. The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact finding process. If the Whistleblowing Investigation Team finds that the alleged wrongdoing or misconduct is true, our company will take appropriate actions including disciplinary action, termination of contract and establishing new controls to prevent recurrence of the wrongdoing or misconduct in our company.
- 5.2 A member of the Whistleblowing Governance Group or an officer appointed by the Whistleblowing Governance Group will within 14 calendar days, contact the person who submitted the whistleblower report to (i) acknowledge that the report has been received, and (ii) indicate how the report will be dealt. The Whistleblowing Governance Group is not obliged to contact the persons who submitted the whistleblower report anonymously, exclude contact details or do not report in good faith.
- 5.3 The Whistleblowing Governance Group will keep a record of all steps taken in response to each whistleblower report received as well as how the concerns raised were resolved.
- 5.4 The Whistleblowing Governance Group will report their findings to the Audit Committee and Board of Directors.

6.0 CONFIDENTIALITY AND SAFEGUARDS

- 6.1 All whistleblower reports will be treated as confidential to the extent reasonably practicable. The identity of the employee or stakeholder who submitted the whistleblower report may be kept confidential so long as it does not impede or frustrate investigation. The investigation process may also reveal the source of the information and the employee or stakeholder who raised the concern may be required to provide a statement as part of the evidence.

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- 6.2 The Whistleblowing Policy offers protection within limits of the law and to the extent reasonably practicable to the employees and stakeholders who submit whistleblower report in good faith, even if the allegations prove to be unfounded or mistaken. These employees and stakeholders will be appropriately protected from internal disciplinary actions (if applicable), dismissal, harassment, victimization or informal pressures. No protection from internal disciplinary action will be offered if Employees do not adhere to the procedures for whistleblower and disclosures in this Policy.

WHISTLEBLOWER REPORT E-FORM

CONTACT INFORMATION					
Name					
NRIC No.					
Employee No. (if applicable)					
Contact Number	(O)		(H)		(HP)
Email Address					
DISCLOSURE					
<i>Please include (i) background and history of concern (giving relevant dates), (ii) reason for concern, and (iii) identity of the person(s) committing the alleged wrongdoing. Insufficient details in the whistleblowing report may impede the investigation and resolution of concerns raised.</i>					

I have read and understood the Whistleblowing Policy. I affirm that all information submitted in my whistleblower report is true to the best of my knowledge and agree to extend my full cooperation to Hiap Teck Venture Bhd in their investigation of my complaint.