



WHISTLEBLOWING POLICY AND PROCEDURES

Kejuruteraan Bina Rangkaian Sdn. Bhd.

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1. OVERVIEW

Whistleblowing is a specific means by which any individual (such as but not limited to employees/ shareholders/ customers/ suppliers/ members of the public) can report or disclose through secure channels, any genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements (“reportable misconduct”) that is taking place/ has taken place/ may take place in the future; of which they are aware, and to provide protection for genuine whistle-blower who report allegations of such malpractice/ misconduct/ wrongdoings from any unfair treatment. The Board will be the ultimate decision maker of whistleblowing cases related to corruption and decide the best course of action for reporting to the authorities and/or regulators in consultation with legal counsel.

2. OBJECTIVE

This policy sets out procedures for all stakeholders to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity.

The Policy is designed to

- a. promote and maintain high transparency and accountability in the workplace;
- b. promote good corporate governance practices among employees;
- c. ensure that whistle-blowers can raise concerns without fear of reprisals;
- d. safeguard the confidentiality of a whistleblower making a genuine disclosure;
- e. provide a transparent and confidential process for dealing with concerns;
- f. protect the long-term reputation of the company;
- g. support the company’s values; and
- h. maintain a healthy working culture and an efficient company.

3. PRINCIPLES

The principles underpinning the Policy are as follows:

- internal procedures to facilitate necessary whistleblowing, in a timely and responsible manner, are in place and made known to all employees of the company;
- all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
- the company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- the identity and personal information of the whistleblower will be protected and kept confidential at all times, unless the individual agrees otherwise or is required by law;
- the whistleblower and the alleged wrongdoer will be treated fairly. The whistleblower will be updated on the status of his/her disclosure and the alleged wrongdoer will be

given an opportunity to respond to all allegations at an appropriate time before the investigation concludes;

- personal information, including the identity of the whistleblower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis;
- the company will ensure no one will be at risk of suffering reprisals as a result of raising a concern even if the individual is mistaken. The company, however, does not extend this assurance to anyone who knowingly raises a matter which is malicious, frivolous, bogus or made in bad faith; and
- any form of retaliation against individuals who have reported a genuine wrongdoing or cooperated with the investigation constitutes a breach of this policy.

4. COVERED CONCERNS

A disclosure relating to, but not limited to, either of the following concerns or wrongdoings by any person in the conduct of the business shall be reported:

- a. corruption, bribery and fraud;
- b. negligence in carrying out work obligations;
- c. criminal offence or any breach of the laws of Malaysia;
- d. blackmail;
- e. acceptance of gifts/favour beyond the threshold allowed by the company;
- f. employee misconduct and breaches of company policy;
- g. misuse and/or misappropriation of the company's funds or assets;
- h. disclosure of confidential information;
- i. impropriety (including financial and operational, etc.) within the company;
- j. gross mismanagement within the company (including serious potential breach to the interest of society and environment);
- k. conflict of interest and collusion;
- l. breach of code of ethics of the company, including sexual, physical or other abuse of human rights; and
- m. acts or omissions which jeopardises the health and safety of the company's employees or the public.

5. CONFIDENTIALITY AND ANONYMITY

All whistleblowing reports are treated confidentially with the whistle-blower's identity protected at all times, to the extent permitted by law. The whistleblower is to be given an assurance that his or her identity will be only known by a few selected persons within the company on a need-to-know basis and for investigation purposes.

The whistleblower will be informed of the outcome of the investigation. This is to encourage and give confidence to the whistle-blower that the complaint is viewed seriously by the company. KBR may consider offering a reward to the whistleblower if the company benefits as a result of the investigations.

6. ACTING IN GOOD FAITH

All whistleblowing reports have to be made in good faith with reasonable belief that the information and allegation is true and not made with bad intention or for personal gain; otherwise, the company reserves the right to take disciplinary action against the whistleblower.

This policy provides assurance that the whistleblower, if he or she is an employee of the Company, will not be subject to any action in accordance with section 368B of the Companies Act 1965 and Whistleblower Protection Act 2010.

The whistleblower shall be protected against reprisals or retaliation and immunity from disciplinary action from the whistle-blowers immediate superior or department or division head or any other persons exercising power or authority over the whistleblower in his or her employment, provided that:

1. Only genuine concerns are reported and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;
2. The whistleblower does not share the contents of the report with parties outside the company;
3. The disclosure is not made with malicious or ill will;
4. The whistleblower was also not involved in the wrongdoing;
5. The disclosure was not made solely for the purpose of avoiding dismissal or any other disciplinary action;
6. The report is not made for personal gain or agenda; and
7. The whistleblower has not committed an offence under the Whistleblower Protection Act 2010.

7. NON-RETALIATION

KBR shall not retaliate against any party that makes a whistleblowing report in good faith for the purpose outlined in this Policy. KBR and/or the reporting party reserves the right to take firm action which can include legal proceedings against the party that retaliates.

8. REPORTING PROCEDURES

- a. Whenever possible, employees are encouraged to include their name and report suspected wrongdoings directly to their immediate superior or Head of Department before resorting to using the whistleblowing channel;
- b. However, if an employee feels that your report may not be given the necessary confidentiality and/or seriousness it warrants, the employee may use any one of the whistleblowing channels listed below. All reports received via these channels will be dealt with the highest level of confidentiality.

Email: jsdaliwal@kjtbr.my, datobahari@gmail.com, wansuhaimi@kjtbr.my,
amar@kjtbr.my

Where possible, whistle-blowers are encouraged to use the attached Whistleblower Reporting Form when making their report. This is to ensure that all critical information related to the alleged misconduct can be accurately recorded to facilitate investigations.

9. PROCESSING OF COMPLAINTS

The KBR officer responsible for managing this Policy will contact the Whistleblower within seven (7) working days of receipt to acknowledge receiving the complaint. Upon the completion of the investigation, the Whistleblower will be notified of the outcome.

KBR reserves the right to refer any complaints suspected of being criminal in nature to the Police, MACC or other appropriate external regulatory authorities.

10. REVIEW

This Policy shall be reviewed periodically to ensure that it remains relevant and in compliance with the applicable laws and regulations of Malaysia.