

## **TWL Holdings Berhad (Company No. 199401039944) (325631-V)**

### **WHISTLEBLOWING POLICY AND PROCEDURES**

#### **1. INTRODUCTION**

**TWL Holdings Berhad and its subsidiaries** (collectively referred to as the “**Group**”) are committed to conduct its business with integrity, and professionalism while achieving the highest level of effectiveness and excellence. It is important that the Group is made to known to any actual or potential illegal or improper conduct which compromises these aspirations. We aim to develop a culture of openness, accountability and integrity, while enabling prompt action to be taken where necessary, in order to mitigate any potential financial or reputational damage arising from serious forms of misconduct.

#### **2. OBJECTIVE**

In line with the above, the Group has adopted this Whistleblowing Policy that outline the Group’s commitment to ensure that its employees and other stakeholders are able to raise genuine concerns in relation to bribery and corruption and other forms of misconduct and to have such concerns be properly investigated and addressed accordingly.

#### **3. SCOPE OF THE POLICY**

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

- i. Fraud;
- ii. Bribery and Corruption;
- iii. Abuse of Power;
- iv. Conflict of Interest;
- v. Theft or embezzlement;
- vi. Misuse of Company’s Property;

- vii. Breach of legal obligation (including negligence, criminal activity, breach of contract and breach of law);
- viii. Miscarriage of justice;
- ix. Endangerment of an individual’s health and safety or of the environment; and
- x. Concealment or cover-up of any of the above.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct or any criminal offence under relevant legislations in force.

#### **4. APPLICABILITY**

This Policy applies to all companies within the Group. This includes all individual working at all levels and grades, including but not limited to managers, executives, directors, employees, consultants, contractors, trainees, seconded staffs, interns, any third party and any other person associated with the Group or have intentions to engage with the Group in any business dealing. All employees of the Group (including full-time, part-time, probationary, contract and temporary staff) (“**Employees**”) are encouraged to report genuine concerns in relation to any illegal or misconduct related to the Group. This policy also applies to members of the public where relevant.

#### **5. DEFINITION OF WHISTLEBLOWING AND WHISTLEBLOWER**

- Whistleblowing occurs when an employee /other stakeholder raise genuine concern about a dangerous or illegal activity or improper conduct that he/she is aware of through his/her work dealing
- Whistleblower refers to the employees or other stakeholder who discloses or reports the wrongdoing.

## 6. WHISTLEBLOWING CHANNELS

The whistleblowing channels available include the following:

- Mailing Address: T3-13A-20, Level 13A, Menara 3, 3 Towers, Jalan Ampang, 50450 Kuala Lumpur.
- Email : [shirleytan@twlholdings.com.my](mailto:shirleytan@twlholdings.com.my),
- Corporate website : [www.twlholdings.com.my](http://www.twlholdings.com.my)
- Written letters or e-mails to the Head of Department /Managing Director/Audit Committee, where applicable.

## 7. ANONYMOUS WHISTLE BLOWER

Any anonymous disclosure will not be entertained in order to prevent invalid malicious reporting, poison letters, exploitation and victimization. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Group to facilitate the investigation and to be protected from any reprisal within the Group as a result of disclosure. However, the Group reserves its right to investigate into any anonymous disclosure.

## 8. REPORTING PROCEDURES

Any misconduct committed or about to be committed should be reported with the following particulars to any of the whistleblowing channels:

- Particulars of Whistleblower
- Details and description of the misconduct including its nature, date, time and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if Whistleblower is not able to identify the identity of the person(s) involved
- Particulars of witnesses or production of documentary evidence, if any.

The whistleblower is responsible to ensure that the disclosure is made in good faith, free from malicious intent, and is not for personal gains. This procedure strictly prohibits frivolous, vexatious, mala fide, bogus disclosure for personal gain or with personal agenda. This is also not a channel for taking up any personal grievances.

Once the report is made, the Head of Department or Designated Executive will respond to the

whistleblower setting out the intended investigation plan. An investigation may include internal reviews, reviews by external auditors, lawyer or some other external body.

Once the investigation is complete, a representative of the Group will inform the whistleblower of the results of the investigation as well as any corrective steps that are being taken.

## 9. CONFIDENTIALITY AND SAFEGUARDS

All whistleblowing reports will be treated as confidential to the extent reasonably practicable. The identity of whistleblower shall be kept in confidential so long as it does not impede or frustrate investigation.

This Policy offers protection within limits of the law and to the extent reasonably practicable to any whistleblower who submits whistleblowing reports in good faith based on reasonable grounds, even if the allegations prove to be unfounded or mistaken.

These individuals will be appropriately protected from internal disciplinary actions (if applicable), dismissal, harassment, victimization or informal pressures.

The Group reserves its right to revoke any protection accorded to a whistleblower under the following circumstances, amongst others:-

- (i) the whistleblower participated in the improper conduct;
- (ii) the whistleblower wilfully discloses a false statement;
- (iii) the disclosure is made with malicious intent;
- (iv) the disclosure is frivolous or vexatious; or
- (v) the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

## 10. REVIEW OF THE POLICY

The Group will monitor compliance with the applicable laws and review this Policy periodically or as and when necessary to ensure that it continues to remain relevant and appropriate.

*The Group reserves the right to amend this policy from time to time.*