



WHISTLEBLOWING POLICIES AND PROCEDURES

1.0 OBJECTIVES

The objectives of these Whistleblowing Policies and Procedures (“WB P&P”) are to: -

- 1.1 provide a mechanism for legitimate concerns related to, amongst others, fraud, financial irregularity, corruption, bribery, serious breaches of the Employees Code of Conduct and Ethics, non-compliance with laws and regulations or company policies, illegal, unethical or questionable practices etc. (collectively referred to as “Misconduct”) to be raised or reported, investigated and where necessary, appropriate action to be taken to resolve such issues promptly and effectively within the LGB Group (“the Group”).
- 1.2 protect a complainant or whistleblower (collectively referred to as “Whistleblower”) from any form of harassment, reprisal or retaliation as a direct consequence of him or her reporting any legitimate concerns under this policy. The protection accorded is to encourage a Whistleblower to report such legitimate concerns whilst removing any fear or risk or disclosure of his or her identity.

2.0 SCOPE

These WB P&P apply to any company under the Group, to all levels of employees, any person associated with the Group as well as stakeholders of the Group.

3.0 DEFINITION

- 3.1 Whistleblowing is generally taken to mean the disclosure of insider knowledge by an employee or stakeholder of any attempted/ suspected/ actual Misconduct within the Group.
- 3.2 A Whistleblower is a person who tells someone of a higher authority or reports through formal channel (i.e. the Whistleblowing Committee) about an alleged Misconduct.
- 3.3 A person is deemed associated with the Group if he or she is a director, partner or employee of the Group or he or she is a person who performs services for or on behalf of the Group.

4.0 RESPONSIBILITY

The Whistleblowing Committee is responsible for the administration and investigation of reports of attempted/ suspected/ actual Misconduct received from Whistleblowers.

5.0 POLICY STATEMENT

- 5.1 All reports of attempted/ suspected/ actual Misconduct are to be directed to the Whistleblowing Committee for assessment and investigation.
- 5.2 All information obtained from a Whistleblower along with his or her identity will be treated as strictly confidential at all times and will not to be disclosed to other parties other than to the person empowered to investigate the case as provided in clause 6.6 below.

- 5.3 A Whistleblower who lodges a legitimate concern will be protected, provided that it was made in good faith and that he or she is not later proved to have acted maliciously, vexatiously or frivolously or the report or complaint is manifestly untrue, or he or she acted for personal gain or personal interest.
- 5.4 The Group views any allegation of harassment, reprisal or retaliation in any form or manner against a Whistleblower reporting a legitimate concern seriously and will treat such action as gross misconduct, which if proven after due inquiry, may lead to disciplinary action, dismissal of the perpetrator(s) and/or other actions as maybe deemed appropriate.
- 5.5 The Group views any party leaking the Whistleblower's identity and confidential information as a serious breach of protocol and will treat such action as gross misconduct, which if proven after due inquiry, may lead to disciplinary action, dismissal of the perpetrator(s) and/or other actions as maybe deemed appropriate.

6.0 PROCEDURES

6.1.1 Employees

If any employee has reasonable ground(s) for believing that any Misconduct has occurred or is occurring in the Group, the employee has the responsibility to verbally report or verbally disclose it in a timely manner to a higher authority (e.g., his or her immediate superior generally) for speedy resolution, if possible.

Otherwise, the initiator or immediate superior may raise a formal report directly to:



the Whistleblowing Committee at we_hear@lgb.com.my

The recipients of the email will be restricted and channelled directly to members of the Whistleblowing Committee.

6.1.2 Other Stakeholders (other than Employees of the Group)

For stakeholders other than employees of the Group, they may raise a formal report directly to the Whistleblowing Committee at the email address provided in clause 6.1.1 above.

6.1.3 Manner in Which a Formal Report Can be Filed

Where a written report is furnished to the Whistleblowing Committee, it should be sealed in an envelope and marked "Strictly Private & Confidential & to be Opened by Addressee only".

A hardcopy of the report to the Whistleblowing Committee can be addressed or hand delivered to:

"Strictly Private & Confidential & to be Opened by Addressee only".

The Whistleblowing Committee
LGB Group
Level 18, Menara LGB,
1 Jalan Wan Kadir,
Taman Tun Dr. Ismail,
60000 Kuala Lumpur.

- 6.2 A Whistleblower who submits a formal report (including allegations or complaints) to the Whistleblowing Committee shall include the following information:
- (a) Name, designation and company/division/department/unit and telephone contact number.
 - (b) Specific description of the incident/case.
 - (c) The name of the individual(s) and entity involved.
 - (d) Documentary evidence, if any, to support the report.
 - (e) Particulars and contact numbers of witnesses, if any.
- 6.3 Anonymous reports are not encouraged, but they may be considered at the discretion of the Whistleblowing Committee.
- 6.4 All reports made must be acknowledged by Whistleblowing Committee and immediately thereafter a preliminary investigation must be initiated to determine the validity of the report and whether it merits further investigation.
- 6.5 The Whistleblowing Committee may delegate the preliminary investigation to designated person(s) and the person(s) empowered to undertake the investigating will:
- (a) be independent and uninvolved in the issue (e.g., another appropriate manager or an appropriate third party);
 - (b) be given appropriate authority, resources and access by the Group to enable the investigation to be effectively carried out;
 - (c) possess legal and/or technical knowledge in the issue concerned (if applicable);
 - (d) preferably have had training or prior experience in conducting an investigation.
- 6.6 The person(s) designated by the Whistleblowing Committee to undertake an investigation may include: -
- (a) head of internal audit department;
 - (b) head of human resource department (for complaints related to staff misconducts); or
 - (c) any other person(s) deemed competent to investigate the Misconduct.
- In delegating the responsibilities, the Whistleblowing Committee will ensure that the designated person(s): -
- (i) is not conflicted;
 - (ii) is not involved in the allegation / complaint filed by the Whistleblower; and
 - (iii) undertakes not to leak or disclose the Whistleblower's identity and confidential information to other parties.
- 6.7 The investigation will promptly establish the facts and collect all necessary evidence by appropriate means, which may include the following:
- (a) making enquiries to establish the facts;

- (b) collecting together all relevant documents and other evidence;
- (c) obtaining witness evidence;
- (d) where possible and reasonable, requesting reports on the issue to be made in writing and signed by the individuals making them.

6.8 Once the investigation is completed, the Group will implement appropriate follow up actions. Depending on the circumstances and severity of the issue, the follow up actions could include one or more of the following: -

- (a) disciplining responsible personnel (which, depending on the severity of the issue, could range from a warning for a minor offence to dismissal for a serious offence);
- (b) reporting the matter to the authorities;
- (c) the Group may also take disciplinary action if any employee: -
 - (i) knowingly makes false or misleading reports about another person; or
 - (ii) acts in a retaliatory, discriminatory or otherwise adverse manner towards a person, as a result of that person making a genuine report or providing assistance in a relevant inquiry; or
 - (iii) intentionally hinders or impedes a formal investigation or fails to assist the investigator(s) in the investigation.

6.9 The Whistleblowing Committee will keep the Whistleblower informed in writing on the progress of the investigation (including the outcome of the preliminary investigation to establish a case for further investigation) and the conclusion arrived therefrom within a reasonable timeframe as soon as a decision is made.

7.0 THE WHISTLEBLOWING COMMITTEE

The duties and responsibilities of the Whistleblowing Committee are stated in their own written Terms of Reference.