

WHISTLEBLOWING POLICY

BUILDING VALUE IN EVERY WAY



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POLICY STATEMENT

NAIM Holdings Berhad and its subsidiaries (together referred to as the “Group”) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. The Group strives to achieve the highest standard of work ethics in the conduct of business in line with NAIM Group’s Code of Business Conduct & Business Ethics.

In line with good corporate governance practices, NAIM provides avenue for all employees of NAIM and members of the public to disclose any improper conduct within NAIM.

1. OBJECTIVE

The objective of this policy and procedure is to provide a mechanism for all level of employees and stakeholders of the Group, acting in good faith, to disclose any improper misconduct and to provide protection for employees and members of the public who report such allegations.

This policy is designed to provide a transparent and confidential process for dealing with concerns. The employee’s concerns about any improper conduct should be reported to his or her Head of Department. If for any reason the employee finds it difficult to report to his or her Head of Department, the employee may report the concerns through the whistleblowing channels.

2. SCOPE

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channels. The type of improper conducts are fraud, corrupt practices and abuse. Such misconducts or criminal offences include, but not limited to the following:-

- i) Fraud;
- ii) Conflict of interest;
- iii) Abuse of Power;
- iv) Theft or embezzlement,
- v) Bribery and corruption;
- vi) Breach of employee’s code of conduct;
- vii) Deliberate concealment of any of the above.

3. WHISTLEBLOWING CHANNELS

Any employee or member of the public who has knowledge or is aware that any improper conduct has been, is being, or is likely to be committed within the Group is encouraged to make a disclosure at the earliest opportunity so that corrective action can be taken as soon as possible via the following reporting channels:

- i) Whistleblowing hotlines - +6082-411667

ii) E-mail: gp.compliance.inquiry@naim.com.my

Email to these channels will be notified to:

- Compliance Officer, Hasmiah Anthony Hasbi
- The Chairman of Audit Committee, Mr Tan Chuan Dyi
- Managing Director, Datuk Hasmi Bin Hasnan
- Deputy Managing Director, Ms Christina Wong
- Head of Internal Audit Department, Ms Denise Yong

4. RESPONSIBILITIES

The Compliance Unit shall be responsible for the administration and compliance with this policy and procedures.

The Head of Division/Department is responsible for reporting all suspected cases or misconduct or theft by an employee to the Head of Internal Audit and/or Head of Compliance.

5. PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. All reports made and the identity of the informer will be treated with the strictest confidence. The informer will be protected from reprisal, 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.

A whistleblower will not be subject to any civil action or criminal liability and no administrative process can be taken against the whistleblower for making disclosure of improper conduct.

6. 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/her identity to the Company in order for the Company to accord the necessary protection to him/her. However, the Company reserves its right to investigate into any anonymous disclosure.