



OMESTI BERHAD
[200001028094 (530701-T)]

WHISTLEBLOWING POLICY



Whistleblowing Policy

1.0 Introduction

In line with good corporate governance practices and with the introduction of the Whistleblower Protection Act 2010 (“the Act”), the Board of Omesti Berhad (“Omesti”) and its group of companies (collectively the “OMESTI Group”) encourage its employees and stakeholders (“Whistleblower”) to report any wrongdoing on the part of employees, management, directors and vendors, in particular with respect of their obligation to the OMESTI Group’s interest.

2.0 Objectives and Scope

2.1 The Whistleblowing Policy (“Policy”) affords an avenue to provide and facilitate a mechanism for any Whistleblower to report concerns about any suspected and/or known wrongdoing, including but not limited to the following:

- fraud;
- misappropriation of assets;
- sexual harassment;
- criminal breach of trust;
- illicit and corrupt practices;
- questionable or improper accounting;
- misuse of confidential information;
- acts or omissions which are deemed to be against the interest of the OMESTI Group, laws, regulations or public policies;
- miscarriages of justice;
- breach of the OMESTI Group’s policies; or
- the deliberate concealment of any of the above or other acts of misconduct, wrongdoing, corruption, fraud, waste and/or abuse.

2.2 The above suspected and/or known wrongdoings are not exhaustive and include any other act or omission, which if proven, will constitute an act of misconduct pursuant to the OMESTI Group’s Code of Ethics and Conduct or pursuant to any criminal offence under the relevant law in force.

2.3 The Policy also provides protection for a Whistleblower who makes such disclosures or reports such allegations.

2.4 The Policy reflects Malaysian law and shall apply to the OMESTI Group.

2.5 All confidential reporting or disclosures by a Whistleblower are to be directed to the designated person in accordance with the procedures under this Policy.



2.6 The procedures outlined in this Policy are not intended to invalidate the OMESTI Group's grievance procedures and/or disciplinary action processes and procedures and are therefore subject to the procedures and restrictions in force.

2.7 Omesti reserves the right to amend the Policy from time to time.

3.0 Policy and Protection

3.1 Anonymity

It is the policy of the OMESTI Group to allow Whistleblowers to either identify themselves or if they prefer, to remain anonymous when reporting suspected and/or known instances of wrongdoings. However, if a Whistleblower chooses to remain anonymous, the OMESTI Group's ability to investigate the alleged wrongdoing will be limited to the extent of the contents of the report received from the Whistleblower.

3.2 Assurance against Reprisal and/or Retaliation

Where a Whistleblower has chosen to reveal his/her identity, it is the policy of the OMESTI Group to provide assurance that the Whistleblower would be protected against reprisals and/or retaliation from his/her immediate superior or head of department / division. In addition, the OMESTI Group provides assurance that no disciplinary action can be taken against a Whistleblower, subject to Section 3.6 and Section 3.7.

3.3 Confidentiality

The OMESTI Group shall treat all reports or disclosures as sensitive and will only reveal information on a "need to know" basis or if required by law, court or authority.

The identity and particulars of a Whistleblower shall also be kept private and confidential unless the Whistleblower chooses to reveal his/her identity.

Where a Whistleblower has chosen to reveal his/her identity when making such a report, written permission from the Whistleblower would be obtained before the information is released.

3.4 Immunity

All costs in relation to any legal liabilities or proceedings (whether criminal or civil) that may be brought against a Whistleblower as a result of the Whistleblower's report shall be borne by the OMESTI Group and the selection of the lawyer defending the legal action shall be made by the OMESTI Group. This immunity and/or protection shall not apply, and the OMESTI Group's rights shall not be affected, in the event of any of the circumstances under Section 3.6 and/or Section 3.7 below.



3.5 Protection

A Whistleblower shall also be protected against:

- (a) action causing injury, loss or damage;
- (b) intimidation or harassment;
- (c) interference with the lawful employment or livelihood of the Whistleblower, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the Whistleblower's employment, career, profession, trade or business or the taking of disciplinary action; and
- (d) a threat to take any of the actions referred to in paragraphs (a) to (c) above.

Where necessary, any person related or associated with a Whistleblower (e.g., immediate family members) shall be accorded with similar protection mentioned in this Section 3.5.

The protection conferred above is:

- (i) not limited or affected in the event that the disclosure does not lead to any disciplinary action or prosecution of the person whom the disclosure of the improper conduct, wrongdoings, corruption, fraud, waste, and/or abuse has been made;
- (ii) however restricted to the Whistleblower reporting the suspected and/or known misconduct, wrongdoings, corruption and instances of fraud, waste and/or abuse involving the OMESTI Group's resources through the OMESTI Group under this Policy.

3.6 Revocation of Policy and Protection

The protection stated in Section 3.5 above shall be revoked by the OMESTI Group if:

- (a) the Whistleblower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud, waste, and/or abuse;
- (b) the Whistleblower willfully or maliciously made his/her disclosure, knowing or believing the information is false or untrue;
- (c) the disclosure is frivolous or vexatious; or
- (d) the disclosure is made with the intention or motive to avoid dismissal or other disciplinary action.

If the Whistleblower protection has been revoked, the OMESTI Group shall give a written notice to the Whistleblower of the revocation together with reasons for the same. In such circumstances, the OMESTI Group reserves the right to take appropriate disciplinary or legal action against the Whistleblower (if the Whistleblower is an employee of the OMESTI Group).



3.7 Acting in Good Faith

The OMESTI Group expects a Whistleblower to act in good faith and have reasonable grounds when reporting a wrongdoing. If allegations are proven to be malicious, a Whistleblower may be subject to appropriate action, up to and including legal action, where applicable.

4.0 Whistleblowing Procedure

4.1 Any person who has knowledge or is aware of any improper conduct within the OMESTI Group is encouraged to make such disclosure in accordance with the procedures stated herein.

- A. In the case of the OMESTI Group's employees, any concern should be raised with his/her immediate superior, and in the case of the OMESTI Group's stakeholders, any concern should be raised with the immediate superior of the employee concerned.
- B. If for any reason, it is believed that the above is not possible or appropriate, then the concern should be reported to the Management of the OMESTI Group.
- C. In the case where reporting to the Management is a concern, then the report should be made to the Chairman of the Audit and Risk Management Committee and the Chairman of the Board of Directors using either one or both of the reporting channels below:
 - i) Via Email (Please send your report to both the Chairmans at the email addresses specified below. However, if your report involves any one of the Chairman specified herein, you may choose to send your report to the Chairman not so involved):
 - 1) ChairmanARMC@omesti.com (only the Chairman of the Audit and Risk Management Committee will have access to this email); and/or
 - 2) ChairmanBOD@omesti.com (only the Chairman of the Board of Directors will have access to this email).
 - ii) Via Mail (Please prepare a copy to be sent to the Chairman of the Audit and Risk Management Committee and the Chairman of the Board of Directors respectively in separate envelopes. However, if your report involves any one of the Chairman specified herein, you may choose to send your report to the Chairman not so involved):



Omesti Berhad
Ho Hup Tower - Aurora Place
02-07-01 - Level 7, Plaza Bukit Jalil
No. 1, Persiaran Jalil 1, Bandar Bukit Jalil
57000 Kuala Lumpur, Malaysia
Attn: Chairman of the Audit and Risk Management Committee

Omesti Berhad
Ho Hup Tower - Aurora Place
02-07-01 - Level 7, Plaza Bukit Jalil
No. 1, Persiaran Jalil 1, Bandar Bukit Jalil
57000 Kuala Lumpur, Malaysia
Attn: Chairman of the Board of Directors

Kindly mark the envelopes as "Strictly Confidential"

- 4.2 The Whistleblower is encouraged to make use of the "Report of Wrongdoings" form provided in Appendix 1.
- 4.3 If a Whistleblower has provided his/her/their details in the "Report of Wrongdoings" form, the Whistleblower will be notified on the outcome of the investigation.

5.0 Procedure for Handling Reports of Wrongdoings

- 5.1 All reports will be assessed promptly by the person receiving the report to decide if an in-depth investigation is required. He/she will thereafter promptly report to the Management based on his/her assessment, if appropriate. If required, he/she can obtain assistance from other resources within the Group (e.g. Group Human Capital Department, Group Legal Department, etc).
- 5.2 If an in-depth investigation is required, the Management may appoint any party from within or outside the ORESTI Group to conduct the investigation. The progress of investigation will be reported to the Audit and Risk Management Committee no later than at the next scheduled meeting. In the event the report is received directly by the Chairman of the Audit and Risk Management Committee and/or Chairman of the Board of Directors, and the matter is deemed inappropriate to be reported to the Management, the Chairman of the Audit and Risk Management Committee and/or the Chairman of the Board of Directors may engage an external party to carry out the investigation subject to the sensitivity and confidentiality of the report. All expenses incurred during the course of the investigation will be borne by the ORESTI Group, provided that they are reasonable given the severity and urgency of the case.
- 5.3 Reports received anonymously will be treated as confidential.
- 5.4 A person making an anonymous report should note that maintaining anonymity may hinder an investigation. Notwithstanding this, anonymity will be maintained as long as it is permitted by law or the person making the report indicates that he/she no longer wishes to remain anonymous.



- 5.5** Whistleblowers and alleged wrongdoers are expected to give their full co-operation in any investigations carried out pursuant to this Policy. In the event an alleged wrongdoer is asked to attend a meeting with the investigation team to discuss the allegations, he/she must take all reasonable steps to attend the meeting.
- 5.6** Upon completion of investigation, appropriate course of action will be recommended to the Audit and Risk Management Committee for their deliberation. The decision taken by the Audit and Risk Management Committee will be implemented immediately. If the alleged wrongdoer is an OMESTI Group employee, any action against the employee will be taken in accordance with the OMESTI Group's policy on "Breach of Code of Conduct, Policies, Rules and Practices".
- 5.7** Where possible, steps will be taken to prevent a similar situation from arising again.



Appendix 1

REPORT OF WRONGDOINGS

1.	Date and Time of Report:	
2.	Details of Alleged Person	
	Name of person alleged:	
	Company of person alleged:	
3.	Details of Incident	
	Incident date and time:	
	Location of incident:	
	Details of allegation*:	
4.	Details of Reporting Party**	
	Name:	
	Contact number:	
	Email address:	
	Company:	

* If you run out of space on the column, you can complete your explanation on a separate sheet of blank paper and attach it to the form. Please also provide supporting documentation to substantiate the allegation, where available.

** We will not document information concerning your name if you wish to remain anonymous. However, please note that if you choose to remain anonymous, the OMESTI Group's ability to investigate the alleged wrongdoing will be limited to the extent of your report. If you do not want to be anonymous, please provide details as per item 4. By providing your details, you agree and consent to us processing your personal data in accordance with the OMESTI Group's Employee Privacy Policy (if you are an employee of the OMESTI Group) or Omesti's Privacy Policy as published at <https://www.omesti.com/PDPA> (if you are an external party).