



## **WHISTLEBLOWING POLICY**

### **POLICY STATEMENT**

Key Alliance Group Berhad (hereinafter referred to as KAGB or the Group) is committed to achieve and maintaining high standards with regards to behaviour at work.

In order to achieve these aspirations, all Personnel and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.

The Group views any harassments or retaliations in any form or manner against genuine whistleblowers seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.

This Policy is applicable to all companies within the Group.

### **POLICY OBJECTIVE**

This Policy is designed to provide an avenue for the Group's Personnel and stakeholders to disclose any improper conduct occurring or related to the Group. This Policy is also to provide protection for those who report such allegations.

### **SCOPE**

This Policy applies to all Personnel of KAGB and stakeholders. This Policy does not include personal grievances not related to the Group.

# **KEY ALLIANCE GROUP BERHAD WHISTLEBLOWING POLICY**

## **REPORTABLE CONDUCT**

Whistleblowing is a specific means by which a Personnel or stakeholder can report or disclose through established channels, concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.

Reportable conduct includes any conduct that constitutes:

- i. Breach in the Company's internal control policies (including Code of Conduct);
- ii. Fraud;
- iii. Bribery;
- iv. Abuse of Power;
- v. Conflict of Interest;
- vi. Theft or embezzlement; and
- vii. Misuse of Company's Property;

This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

## **PROTECTION TO WHISTLEBLOWER**

In line with the Whistleblower Protection Act 2010, a whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, a whistleblower will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the organisation, to the extent reasonably practicable, 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.

The Group strictly forbids all forms of action that could cause damage to the whistleblower as a result of making the disclosure, including:

- Termination of employment;
- Harassment, bullying or intimidation;
- Personal or financial disadvantage;
- Unlawful discrimination;
- Harm or injury; including psychological harm;
- Damage to reputation; or
- Any other conduct that constitutes retaliation.

The Company will take all reasonable steps to protect the Whistleblower from damage and will take action it considers appropriate when such conduct is identified.

## WHISTLEBLOWING PROCEDURES

Any concern should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to Board Chairman. Channel of reporting to the Board Chairman is as follows:

Name: Dato' Zaidi Bin Mat Isa @ Hashim  
Telephone: 03-78807725  
Email: zaidi@kag.com.my  
Mail: Lot 18.2, 18th Floor,  
Menara Lien Hoe,  
No.8 Persiaran Tropicana, 47410 Petaling Jaya

In cases where reporting to management is a concern, then the report should be made to the Chairman of the Audit and Risk Committee. Channel of reporting to the Chairman of Audit Committee is as follows:

Name: Lee Kien Fatt  
Telephone: 03-78807725  
Email: lkf3826@kag.com.my  
Mail: Lot 18.2, 18th Floor,  
Menara Lien Hoe,  
No.8 Persiaran Tropicana, 47410 Petaling Jaya

## ACTIONS

All reports of misconduct, findings of investigations and monitoring and corrective actions shall be centralised and logged in a log administered and monitored by the Head of Finance and Administration. The Board shall be informed of any new reports of misconduct and may request to review the log at any time.

1. All reports submitted will be investigated promptly by the person receiving the report. Kindly refer to **Appendix A** for **Whistleblower Report Form**. If required, he / she can obtain assistance from other resources within the Group (e.g. Group Internal Audit, Group Human Resource Department, etc). The progress of investigation will be reported to the Audit and Risk Committee no later than the next scheduled meeting.
2. Reports received anonymously will be treated as confidential.
3. The person making anonymous report will be advised that maintaining anonymity may hinder an investigation irrespective of this, anonymity will be maintained as long as it's permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
4. Where possible, steps will also be implemented to prevent similar situations arising.

## **FURTHER ACTIONS**

If for any reason, the person making the report is not satisfied by with the way his report had been dealt with, he/she can escalate to the Chairman of the Board of Directors. Channel of reporting to the Chairman of the Board of Directors is as follows:

Name: Dato' Zaidi Bin Mat Isa @ Hashim  
Telephone: 03-78807725  
Email: zaidi@kag.com.my  
Mail: Lot 18.2, 18th Floor,  
Menara Lien Hoe,  
No.8 Persiaran Tropicana, 47410 Petaling Jaya

Chairman of the Audit and Risk Committee will deliberate the report with his Committee members and decide on the appropriate course of action.

**KEY ALLIANCE GROUP BERHAD  
WHISTLEBLOWER REPORT FORM**

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Group. Please note that you may be called upon to assist in the investigation, if required.

*Note: Please follow the guidelines as laid out in the Whistleblowing Policy.*

<b>Reporter's Contact Information</b>		
Name		
I/C No. / Passport No. / Staff No.		
Correspondence Address		
Telephone No.	Home	
	Office	
	Mobile	
E-mail Address		
Designation / Occupation		
Division/Section/Unit/Branch		
Preferred method of communication	<input type="checkbox"/> Mail <input type="checkbox"/> E-mail <input type="checkbox"/> Telephone / SMS	

<b>Suspect's Information</b>		
<b>Individual 1</b>		
Name		
Designation		
Division/Section/Unit/Branch		
Contact Number		Email Address
How do you know this employee?		
<b>Individual 2</b>		
Name		
Designation		
Division/Section/Unit/Branch		
Contact Number		Email Address
How do you know this employee?		

Suspect's Information			
<b>Individual 3</b>			
Name			
Designation			
Division/Section/Unit/Branch			
Contact Number		Email Address	
How do you know this employee?			

Details of Misconduct		
<p><b>COMPLAINT:</b> Briefly describe the misconduct / improper activity and how do you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</p>		
What misconduct / improper activity occurred?		
Who committed the misconduct / improper activity?		
When the misconduct / improper activity occurs? And since when did you notice about it?		
Where did the misconduct / improper activity happen?		
Is there any evidence that you could provide to us? *		
Do you have any other details or information which would assist us in the investigation?		
If money involved, can you estimate the amount of money involved?	Yes	No
If YES, please indicate the estimated amount of money involved (cross X where applicable):		
Less than RM500	<input type="checkbox"/>	
RM501 to RM10,000	<input type="checkbox"/>	
RM10,001 to RM50,000	<input type="checkbox"/>	

**Details of Misconduct**More than RM50,001 

Have you lodged a complaint on this matter to another person / department / authority before?

Yes

No

If YES, please indicate the person / department / authority that the report was lodged (cross X where applicable and attach copy of the report made):

Police Malaysian Anti-Corruption Commission Others, please indicate: 

Date of report was made

Status of report made

**Declaration**

I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.

I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.

Signature

Name

Date

**For office use only**

Record No.	
Receipt Information	Person receiving this report:
	Date Received:
	Acknowledgement of receipt sent on:
Investigation required (YES / No)? (If No please state the reason)	
Investigation Done By:	
Investigation Result:	
Action Taken / Conclusion:	
Reported to the Board on:	
Signed off by:	