

# **DeGem Berhad**

(Company Number 415726-T)  
(Incorporated in Malaysia)

## **WHISTLE BLOWING POLICY**

### **Policy Statement**

Degem Berhad (“Degem” or “the Company”) is committed to maintain and achieve a high standard of corporate governance and business integrity. Recognising the above interest, DEGEM provides avenue to employees and stakeholders (shareholders, customer and suppliers) to raise concerns and take appropriate action to resolve them effectively.

The policy is applicable to all companies within the DEGEM Group.

### **Objectives of the Policy**

The objectives of the policy are as follows:-

- Establishes the rules and procedures for employees and stakeholders to report/raise a genuine concern or allegation through the appropriate channel upon discovery of possible misconduct;
- Provides the avenue to employees and stakeholders to disclose any concern or allegation in accordance with the procedures; and
- Provides protection to individual who report the concern or allegation (“the whistleblower”).

### **Scope of the Policy**

This policy is designed to facilitate the whistleblower to disclose any concern or allegation through internal channel. Such concern not only covers improprieties in matters of financial reporting but also the following:-

- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Conflict of interest;
- Sexual harassment;
- Misuse of confidential information; and
- Concealment of any or a combination of the above.

### **Principles**

The principles underpinning the policy are as follows:-

- All concerns raised will be treated fairly and properly;
- The Company will not tolerate harassment or victimization of anyone raising a genuine concern;
- Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;

- The Company will ensure that any individual raising a concern is aware of who is handling the matter; and
- The Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this assurance to someone who maliciously raises a matter he/she knows is untrue.

**Whistleblowing Channel**

If any employee believes reasonably and in good faith that malpractice exists in the work place, the employee should report this immediately to the line manager. However, if for any reasons the employee is reluctant to do so, then the employee should report the concerns directly to the Senior Independent Non-Executive Director, being the Director identified in the Company's Annual Report as one to whom concerns may be conveyed:-

Name : Mr. Leou Thiam Lai  
E-mail : whistleblower@degemdiamond.com  
Attention : Senior Independent Non-Executive Director

Any anonymous whistleblower will not be entertained. Any whistleblower is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

Any report should also be based on good faith with a reasonable belief that the information and any allegations in it, are sustainably true and not acting for personal gain.

**Action**

All reports will be investigated promptly. If required, assistance from other resources within and outside the Group is to be sought.

Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.

Where possible, steps will also be implemented to prevent similar situation arising in the future.

**Confidentiality**

The identity of whistleblower will be kept confidential. Consent of whistleblower will be sought should there be a need to disclose identity for investigation purposes.

**Disclaimer**

DEGEM reserves the right to amend this policy from time to time.

Signed and approved by the Board  
on 21 February 2013