

WHISTLE-BLOWING POLICY

Introduction

IFCA MSC Berhad ("IFCA Group") is committed to a high degree of integrity, transparency and good governance in the conduct of its operations. In view of this, the Whistle-blowing Policy has been established to encourage and provide an avenue for a whistle-blower to raise concerns of any wrongdoings without fear of reprisals.

Objective of the Policy

The policy is:

- To help develop a culture of accountability and integrity within IFCA Group;
- To provide a safe and confidential avenue for ALL employees, external parties and other stakeholders to raise concerns about any poor or unacceptable practice or misconduct;
- To reassure Whistle-blowers that they will be protected from detrimental action or unfair treatment for disclosing concerns in GOOD FAITH;
- To deter misconduct and promote standards of good corporate practices.

Scope of the Policy

This Policy governs the disclosures, reporting and investigation of misconduct within the Group as well as the protection offered to the persons making those disclosures from detrimental action in accordance to Whistleblower Protection Act 2010.

The scope of the policy applies to IFCA Group's staff, Board members and other stakeholders.

Misconduct includes:

- Criminal offences like corruption, bribery, fraud; or
- Intentional misrepresentations, misstatements, omissions, directly or indirectly affecting financial statements; or
- Failure to comply with any legal obligations; or
- Danger to the health and safety of any individual or the environment; or
- Improper conduct or unethical behavior; or
- Attempts to conceal any of the above.

Protection to Whistleblower

It is IFCA Group's policy to provide the Whistle-blower protection in term of confidentiality of information, and safeguard the Whistle-blower from any act of interference that may be detrimental to the Whistle-blower. The Group assures that all reports will be treated with strict confidentiality and upon verification of genuine cases, prompt investigation will be carried out.

Procedures of the Whistleblowing Policy

Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company.

(Refer to Attachment 1 for sample format of report)

Notification on the Outcome of the Disclosure

IFCA Group reserves the right not to inform the Whistle-blower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owned to someone else.

Communication 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 reason the employee is reluctant to do so, then the employee should report the concern via the following channels:

Name	Audit Committee	Board of Directors	Email
Eng Kim Haw	Chairman	Independent Non-Executive Director	engkh1966@yahoo.com.my or whistleblower@ifca.com.my
Fung Kam Foo	Member	Independent Non-Executive Director	alankffung@gmail.com
Norliza Binti Rasool Khan	Member	Independent Non-Executive Director	norlizakhan@gmail.com

Any report can be submitted confidentially via email to any of the above Independent Non-Executive Director.

Required Evidence

The Whistle-blower should, at a minimum, be required to provide in the complaint or report, in writing, information regarding the type of activity or conduct constitutes the Reportable Misconduct, identify the person(s) suspected as being involved, when it occurred and who was affected. The information should be first-hand knowledge of the facts disclosed in the Report.

In the event there is insufficient evidence to support their allegation, the Whistle-blower should not be discouraged from making a Report.

Process of Making Disclosure



Monitoring and Review

The Audit and Risk Management Committee will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

The Whistle-Blowing Policy has been adopted by the Board on 17 April 2018.

WHISTLE-BLOWING REPORT**The Reporting Individual (if not anonymous)**

Name :

Contact Number :

Email :

Company/Department :

Date :

The Report

Parties Involved (kindly use a separate sheet if more space is required)

Date of Incident :

Means of Discovery :

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Other Witness / Source :

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Evidence / Reference :

Documents :

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