



## **PLENITUDE BERHAD WHISTLEBLOWING POLICY**

Plenitude Berhad (“Plenitude”) is committed to achieving the highest possible standards of ethics in all its practices and to ensuring that the business operations are carried out professionally in accordance with relevant laws, rules, regulations, business ethics and conduct, and recognise that all employees have an important role to play in achieving this goal.

The policy applies to employees of Plenitude. It also applies to external parties providing services to Plenitude such as the suppliers/contractors, advisors, consultants, internal and external auditors, Board members i.e. Board of Directors, the Audit Committee, the Nomination Committee and the Remuneration Committee, and shareholders.

The Plenitude’s Whistle Blowing Policy will:

- Govern the process through which employees and others reporting potential violations or concerns relating to relevant laws, rules, regulations, business ethics and conduct, including any violations or concerns relating to illegal, immoral, embezzlement and fraudulent activities;
- Establish a mechanism for responding to any reports from employees and others regarding such potential violations or concerns;
- Prohibit legal sanctions for retaliatory action taken against the whistle blower;
- Ensure that this policy is properly communicated to all employees;
- Establish procedures for the retention of records of reports; and
- Protect confidentiality.

This policy encourages employees’ freedom of speech, promote integrity and report any wrongful activities and wrongdoings at the earliest possible stage in the right way to proper authority so that immediate action can be taken. It also encourages employee to use internal mechanisms for reporting any wrongful activities and wrongdoings by employees or others.

The whistle blower will be protected against victimisation or other adverse treatment. However, any disclosure which is not made in good faith and is found to be deliberately falsified with malicious intent will be subjected to disciplinary action by Plenitude in accordance with the Plenitude Human Resource Policies and Procedures or other appropriate actions.

All employees of Plenitude must follow this Whistle Blowing Policy and cooperate with any review and investigation initiated pursuant to this Whistle Blowing Policy. Guidance to this Whistle Blowing Policy is provided in Whistle Blowing - Procedures below.

The Chief Executive Officer of Plenitude shall have the responsibility for the implementation of the Whistle Blowing Policy and Whistle Blowing Procedures. The administration of the policy and procedures is to be carried out by the Human Resources Department of the respective companies. The Board of Directors shall exercise the oversight function over the administration of the policy.

This policy does not replace any Human Resources policies and procedures that will enable you to lodge a grievance relating to your own employment in Plenitude.



## WHISTLE BLOWING - PROCEDURES

### Whistle Blowing Procedures For Reporting Of Wrongful Activities And Wrongdoings

1. All reports of wrongful activities and wrongdoings are to be made to the Audit Committee Chairman and/or the Company Secretary via written letter.
2. The letter should be addressed to the "Audit Committee Chairman" and/or "The Company Secretary" and sent to the following address:-

Plenitude Berhad  
2nd Floor, No. 2  
Jalan Sri Hartamas 8  
Sri Hartamas  
50480 Kuala Lumpur  
Malaysia

Email: [wb@plenitude.com.my](mailto:wb@plenitude.com.my)

3. To facilitate the investigation, the letter MUST state the following particulars and any anonymous complaint will not be entertained:-
  - a. The name and NRIC of the employee/whistle-blower
  - b. The designation of the employee/whistle-blower
  - c. The company of the employee/whistle-blower
  - d. The contact particulars of the employee/whistle-blower
4. To facilitate the investigation, the complaint MUST state clearly in the letter of the wrongful activities and wrongdoings. Any vaguely complaint will not lead to further investigation.
5. Upon review of the letter of complaint, you may or will be call-up to assist in the investigation. Your complaint will be treated with confidentiality and the Plenitude Whistle Blowing Policy protects you against any victimization or any other adverse treatment.
6. However, any disclosure which is not made in good faith and is found to be deliberately falsified with malicious intent will be subjected to Disciplinary Action by Plenitude in accordance with the Plenitude Human Resource Procedures Manual or any other appropriate actions.

The Board of Directors of Plenitude adopted this policy on 22 May 2014.