



SPRING ART HOLDINGS BERHAD

WHISTLE BLOWING POLICY AND PROCEDURES

1. Policy Statement

- a. Spring Art Holdings Berhad (the Company) is committed to achieving and maintaining high standards with regards to behavior at work as set out in the Company's Code of Conducts
- b. In order to achieve the standards, set in the Company's Code of Conducts, all employees and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.
- c. The Company views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.
- d. The policy and procedures are applicable to all companies within Spring Art Group.

2. Whistle Blowing

- a. Whistle Blowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.
- b. Only genuine concerns should be reported under Whistle Blowing procedures. 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.

3. Procedures

- a. 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 Managing Director. Channel of reporting to Managing Director is:

Name: Lim Kok Eng
Telephone: +606 985 9971
Mail: *Mark* **Strictly Confidential**
Spring Art Holdings Berhad
Lot PLO49, Jalan Rami 4,
Kawasan Perindustrian Bukit Pasir,
84300 Bukit Pasir, Muar, Johor, Malaysia.
Attention: Managing Director

- b. In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name: Ivan Law
Telephone: +606 985 9971
Mail: *Mark* **Strictly Confidential**
Spring Art Holdings Berhad
Lot PLO 49, Jalan Rami 4,
Kawasan Perindustrian Bukit Pasir,
84300 Bukit Pasir, Muar, Johor, Malaysia.
Attention: Audit Committee Chairman




4. Action

- a. All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group (e.g. Internal Audit, Human Resource Department, and Legal Department etc.). The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- b. Reports received anonymously will be treated as confidential.
- c. 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.
- d. 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.
- e. Where possible, steps will also be implemented to prevent similar situation arising.

5. Further action

- a. If for any reason, the person making the report is not satisfied with the way his report had been dealt with, he can escalate his report to the Chairman of Audit Committee. Channel of reporting to the Chairman of Audit Committee are:

Name: Ivan Law
Email: ivan.law@ilco2u.com
Telephone: +606 985 9971
Mail: **Mark Strictly Confidential**
Spring Art Holdings Berhad
Lot PLO 49, Jalan Rami 4,
Kawasan Perindustrian Bukit Pasir,
84300 Bukit Pasir, Muar, Johor, Malaysia.
Attention: Audit Committee Chairman

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