



PRESS METAL ALUMINIUM HOLDINGS BERHAD

Registration No. 201601027232 (1198171-H)

WHISTLE-BLOWING POLICY

Definitions		Meaning
AC	:	Audit Committee of the Company
Board	:	The Board of Directors of the Company
COC	:	Code of Conduct
COE	:	Code of Ethics
Director	:	Includes all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors
Employees	:	All individuals directly contracted to the Group on an employment basis, including permanent and temporary employees excluding Directors and Management
Group	:	The Company and its subsidiaries, collectively
PMAH or the Company	:	Press Metal Aluminium Holdings Berhad (Registration No. 201601027232 (1198171-H))
Subsidiary	:	A corporation in which the Company controls the composition of the board of directors, controls more than half of the voting power or holds more than half of the issued share capital excluding preference shares

1. Introduction

This policy is intended for Group and its external stakeholders.

The Group is committed to comply with applicable regulation and conduct business activities ethically, by demonstrating honesty, integrity, transparency and accountability in our business conducts and dealings.

2. Purpose

The purpose of this policy is to provide a formal and confidential channel to enable our stakeholders to speak up and report in good faith any improper conduct or illegal acts, including act or conduct that is in the violation of the COC, known malpractices or misconduct, illegal or unethical behaviour (hereinafter known as “Misconduct”) within the Group without fear of retaliation or unfair treatment.

3. Objectives

The main objectives of this Policy are to:

- (a) Promote and maintain high transparency, integrity and accountability in the workplace;
- (b) Promote good corporate governance practices in the workplace;
- (c) Provide an avenue for employees and stakeholders to raise their concerns in good faith, without fear of reprisal and safeguard such person’s confidentiality;
- (d) Protect whistleblower from reprisal as consequence of making a disclosure;
- (e) Provide a transparent and confidential process for dealing with concerns;
- (f) Protect the long-term reputation of the Company;
- (g) Support the Company’s values;
- (h) Maintain a healthy working culture and an efficient company; and
- (i) Ensure that all allegations are thoroughly investigated for appropriate action.

4. Scope

This policy applies to all Directors and employees of the Group, and external parties such as vendors, clients, contractors and other stakeholders.

This policy governs the reporting and investigation of improper or illegal activities as well as the protection offered to the whistle-blower who acts in good faith.

The Misconduct covers but is not limited to the following:

- (a) improprieties or irregularities (including financial and operational);

- (b) suspected fraud or criminal offences;
- (c) breach of confidentiality;
- (d) miscarriage of justice;
- (e) corruption or bribery;
- (f) intentional misrepresentations, misstatements, omissions, directly or indirectly affecting financial statements or operation of the Group;
- (g) endangerment of an individual's health and safety; and
- (h) failure to comply with legal or regulatory requirements.

A person or entity making a protected disclosure is commonly referred to as a "Whistle-blower". Whistle-blowers provide initial information related to a reasonable belief that a Misconduct has occurred.

5. Safeguard

Whistle-blowers are protected against being dismissed or penalised by the Group, and the Group will consider mitigating circumstances if the Whistle-blower himself/herself is involved in the activity that he/she reports. **Mischievous or malicious reports are considered an abuse of this whistle-blowing mechanism and will face severe consequence.**

A Whistle-blower's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

6. Harassment or Victimisation

Harassment or victimisation for reporting concerns under this policy will not be tolerated.

Complete protection will be given to Whistle-blower against any unfair practice including but not limited to retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or including any direct or indirect use of authority to obstruct the Whistle-blower's rights to continue to perform his/her duties including making further disclosure.

The Whistle-blower will be protected under the Whistle-blower Protection Act 2010 if he or she makes a disclosure in good faith to an enforcement agency.

7. Confidentiality

Every effort will be made to treat the Whistle-blower's identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the Whistle-blower to any third party not involved in the investigation or prosecution of the

matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality.

The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by a court of law. The Group's assurance of confidentiality can only be completely effective if the Whistle-blower likewise maintains confidentiality.

8. Anonymous Allegations

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Misconduct expressed anonymously will be explored appropriately, but consideration will be given to:

- (a) The seriousness of the issue raised;
- (b) The credibility of the concern; and
- (c) The likelihood of confirming the allegation from attributable sources.

9. Procedures

9.1 Procedures for handling the reported allegations

(a) Reporting

Managers, officers and employees in supervisory roles shall report to the reporting person(s) as stated below on any allegations of suspected improper activities or employment-related concerns, including those relating to financial reporting, unethical or illegal conduct to the Chairman of the AC. All whistle-blowing report shall be in writing.

The report can be made in the following manner:

- (i) verbally and subsequently required to fill up and furnish the Whistle-Blower; or
- (ii) Emailing the Whistle-Blower Form at the following e-mail address: whistleblowing@pressmetal.com or
- (iii) Completed Whistle-Blower Form in writing addressed to and forwarded in a sealed envelope to the designated person labelling with a legend such as "To be opened by the Chairman of the AC only."

Attention: **Audit Committee Chairman**

Press Metal Aluminium Holdings Berhad
Suite 61 & 62, Setia Avenue
No. 2 Jalan Setia Prima S U13/S
Setia Alam, Seksyen U13
40170 Shah Alam
Selangor, Malaysia

The Whistle-blower is encouraged to disclose his/her name, NRIC number and contact details. The disclosure must at least have details of person(s) involved, nature of allegation, when and where the incident took place as well as supporting evidence, if any.

(b) Handling of a reported allegation

The action taken by the Group in response to a report under this policy will depend on the nature of the report. The Chairman of the AC shall receive information on each report and follow-up information on actions taken.

9.2 Investigator

The internal auditors shall be the named Investigator unless the Chairman of the AC assigns/appoints another Investigator. Investigators must be impartial and independent of all parties concerned.

Investigations should be launched only after preliminary consideration that establishes that:

- (a) The allegation, if true, constitutes an improper act, and either:
- (b) The allegation is accompanied by information specific enough to be investigated, or
- (c) The allegation has or directly points to corroborating evidence that can be pursued. Such evidence may be testimonial or documentary.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of the AC.

9.3 Inquiries

- (a) Initial investigation will be performed to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for full investigation.
- (b) If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Company's COE or COC or the Law, the results of the investigation shall be reported to the Chairman of the AC in accordance with the applicable procedures for company conduct and the administration of discipline. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.
- (c) If an investigation leads to the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the Chairman of the AC. The AC shall bring forward the results of investigation to the Board. The Board shall decide on the appropriate next course of action to be taken.

10. Duties and Responsibilities of the Chairman of the AC

The AC is committed to investigate and address all cases of reported misconduct. The Chairman of the AC shall:

- (i) Receive and filter complaints;
- (ii) Determine actions to be taken;
- (iii) Assign investigations;
- (iv) Ensure closures and conclusion;
- (v) Report to the Board of Directors for further action; and
- (vi) Report to the relevant authorities, if required.

The concerns reported to the Chairman of the AC will be managed by the Chairman of the AC and he/she shall have the right to decide depending on the seriousness of the reported incident(s), whether to commence investigation to the inquiry, based on the supporting documents and facts gathered.

The Chairman of the AC shall determine the channel for investigation and follow-up action. In order to ensure independence to the inquiry, the Chairman of the AC shall assign the Head of Internal Auditors as the investigator, unless for reasons of conflict of interest, inadequate competence, or enhancing corporate governance, may form an Investigation Committee.

The Investigator shall determine the resources required to complete the investigation within a time set.

The Chairman of the AC shall delegate the authority to the Investigator on unrestricted access to the Group's records and premises, whether owned or rented, without prior knowledge or consent of any person who have custody of any such records when it is within the scope of the investigation.

The Whistle-blower may seek follow-up information about an investigation of a report or any consequent action taken. Subject to legal limitation, the Whistle-blower will be kept informed of the final outcome of the investigation.

11. Reporting

The written report of the conclusion of all cases shall be properly documented. The report shall be made available upon request by any members of the AC.

The concerns reported to the Chairman of the AC will be managed by the Chairman of the AC and he/she shall have the right to decide, depending on the seriousness of the reported incident(s), to report to the relevant enforcement authority(ies) (if the Chairman of the AC concluded that such incidents should be reported, based on the supporting documents and facts gathered).

12. Policy Matters

This policy shall be published at the Company's website and shall be displayed prominently at all the Group premises.

13. Monitoring and Periodic Review of Policy

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group and, if necessary, implement changes subject to the approval of the Board.

This policy will be reviewed periodically to assess its effectiveness.

Adopted by Board: 26 February 2019

Reviewed and Adopted by Board on: 26 November 2020

2nd Review and Adopted by Board on: 29 November 2022

For Press Metal Use only:

Whistle-Blower File No:

PM-WB -

Appendix 1

Private & Confidential

Whistle-Blower Form

Please provide the following details for any Misconduct and submit the form as per the Procedure. Please note that you may be called upon to assist in the investigation, if required.

Briefly describe the Misconduct and how you know about it as per the criteria outlined. There is no limitation to the pages for the report.

Incident	Date:	Time:
Incident Location:		
Name of Alleged Person(s)/ Unit/ Division/ Department:		
Description/ Circumstances of Alleged Incident with the following criteria: ✓ What, ✓ How, <i>(To supporting document(s)/ evidence(s) for the claim)</i>		
Witness Information: ✓ Name ✓ Contact Number <i>Kindly indicate whether staff or non-staff.</i> <i>There is no limit to the no of witness(s).</i>		

Appendix 1 (Cont'd)
*Private & Confidential***Information to be filled by Whistle-Blower:**

*Anonymous complaints are accepted but subject to the seriousness of the issues raised, concern may **NOT** be investigated*

Name:	
Designation and Unit/ Division/ Department of the Group (if applicable):	
Contact Number and Email Address:	
Date of Report:	
Remark:	

I hereby confirm that the information provided herein is accurate, correct and that the documents submitted along with this application form are genuine.

(Signed by Whistle-Blower)

Note:

Any false information and/or purposely and/or malicious and/or dishonour an image of the employee or the Company/ Group and misuse of the Whistle-Blowing mechanism shall face serious consequences.

By submitting Whistle-Blower Form will automatically provide consent to the Company to use and disclose the Whistle-Blower's personal data if required under the provision of the law or for the purpose of conducting a competent investigation.