




KUMPULAN KITACON BERHAD

Registration No. 202201006838 (1452535-V)

WHISTLE-BLOWING POLICY & PROCEDURES

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1. PURPOSE

In line with good corporate governance practices, the Management and Board of Directors of Kumpulan Kitacon Berhad (“KITACON”) encourage all its employees and stakeholders of KITACON to report any suspected inappropriate behavior or misconduct relating to **fraud, corrupt practices and/or abuses** involving KITACON’s resources.


The objective of this Policy is to provide a mechanism for all level of employees and stakeholders of KITACON to whistle-blow on any suspected wrongdoing, inappropriate behavior or misconduct relating to fraud, corrupt practices and/or abuse in a timely manner in order for the Management to take swift action.

2. DEFINITIONS

- a) **Fraud** is generally defined as “any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain”.

In the context of KITACON, the definition of “fraud” includes:-

- Any action(s) deliberately designed to cause loss to KITACON, or to obtain any unauthorized benefit, whether this is received personally or by others;
 - **Occupational Fraud / Misappropriation of Assets** – i.e. use of one’s occupation for personal enrichment through the deliberate misuse or misappropriation of KITACON’s resources and/or assets and/or the act of making false representations of material facts whether by words or conduct, by concealing information, or by making misleading statements in order to obtain some benefit or payment that would otherwise not have existed;
 - **Fraudulent Financial Reporting** – i.e. intentional manipulation of financial statements, intentional misstatements and false disclosure of financial information; and
 - Any other acts committed knowingly, willfully and intentionally which violates KITACON’s employment terms and conditions either for the person’s own benefit, and/or for the benefit of some other party.
- b) **Corrupt practices** are operationally defined as the misuse of entrusted power for private gain.
- c) **Abuse** consists of any other practices that cause unnecessary losses or costs to a company. Abuse may be similar to fraud, except that it is not possible to prove that abuse was performed knowingly, willfully and intentionally.
- d) **Whistle-blower**
A whistle-blower is a person or entity making a protected disclosure on wrongdoing(s) or inappropriate behavior of misconducts. Whistle-blowers may be KITACON’s employees, vendors, contractors or the general public. The whistle-blower’s role is as a reporting party. They are not investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.

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3. POLICY & PROCEDURES

3.1 Anonymity & Confidentiality

- (i) KITACON recognizes that the provision of anonymity to any individual/employee who willingly comes forward to report a suspicion of fraud is key in encouraging such reporting.
- (ii) However, to prevent false malicious reporting, poison letters and abuse of the reporting channel, all reporting individual(s) ("whistle-blower") must identify themselves and provide contact information in their reports which will be useful for the following purposes :-
 - To enable the independent investigation panel to verify each report and to obtain further information, if required;
 - To facilitate any further investigations by auditors or the authorities where the identity of the informer is required by law; and
 - To facilitate the communication of results of investigation to the whistle-blower.
- (iii) KITACON will treat all reports and information provided as sensitive and will only reveal them on a "need-to-know" basis for the purposes of investigating the reports.
- (iv) The Chairman of the Audit & Risk Management Committee will have the ultimate discretion whether to reveal the identity of the whistle-blower. In the event that it is necessary to reveal the whistle-blower's identity, permission from the whistle-blower would be obtained before the information is released.
- (v) The same shall apply if the whistle-blower is not an employee of KITACON.

3.2 Procedures for reporting fraud, corrupt practices and/or abuse

- (i) The following person and channels will be the point of contact for reporting any concern:

a) Whistle-blowing hotlines


- i. Direct line: **+603 3372 4162 / Ext: 320**
- ii. E-mail: whistleblowing@kitacon.com.my

Faxes and email to these channels will be directed to:

- The Chairman of Audit & Risk Management Committee

b) Contact details

Contact person	Contact details	
Mr. Low Chin Ann Chairman of Audit & Risk Management Committee	No. 24, Jalan Rengas, Taman Selatan, 41200 Klang, Selangor Darul Ehsan.	Office Phone : +603 3372 4162
		E-mail: whistleblowing@kitacon.com.my lowchinann@kitacon.com.my

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3.3 Procedures for handling Whistle-blowing Reports

- (i) Any concerns should be reported to the immediate superior. However, if it is not possible or appropriate to do so, the concerns should then be reported to the Chairman of the Audit & Risk Management Committee.
- (ii) An investigation will then be carried out by authorised personnel who is/are independent from the reported incident to ensure an objective and independent investigation process.
- (iii) Upon completion of the investigation, an appropriate course of action will be recommended to the Audit & Risk Management Committee for their deliberation. The Audit & Risk Management Committee will review the investigation report and submit a summary report to the Board of Directors for their information and/or action, where applicable.

4. REVIEW OF POLICY

This Policy will be reviewed periodically to assess its effectiveness by the Board of Directors and/or the Audit & Risk Management Committee. Any revisions, amendments to this Policy will be communicated to all employees of the Group and published on the Company's website accordingly.

(This Policy was approved and adopted by the Board on 18 April 2023)