

RALCO CORPORATION BHD  
Company No. 333101-V  
(Incorporated in Malaysia)

## **WHISTLE BLOWING POLICY (“The Policy”)**

### **Overview :**

Whistle Blowing is a specific means by which any Employees or Stakeholders (i.e. shareholders/ customers / suppliers) can report or disclose through established channels, genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements (“reportable misconduct”) that is taking place / has taken place / may take place in the future; of which they become aware and to provide protection for the party, who report allegations of such malpractice/misconduct /wrongdoings.

### **Objective :**

To blow the whistle on someone is to alert a third party that a person has done, or is doing, something wrong. So, literally, “whistle-blowing” means that one makes a noise to alert others about misconduct. By blowing the whistle on misconduct in an organization, one alerts the organization to the fact that its stakeholders are being wrongfully harmed, or that they are at risk of harm.

The Policy is designed to support to the following:

- Be committed to the Company’s business ethics of Honesty, Integrity and Transparency;
- To provide a transparent and confidential process in handling the reported case by the Technical Review Panel;
- To uphold the moral duty being a Company by protecting the interest of all its stakeholders;
- To encourage Employees or Stakeholders reporting on the report or disclose through the established channel, without fear of retaliation or reprisal should they act in good faith when reporting the concerns/ wrongdoings; and.
- To promote good corporate governance and to uphold integrity in all of Company’s operational activities and business dealings.

### **Types of Misconduct/Wrongdoings:**

Parties can make a whistleblowing complaint if they are aware of any wrongdoing, including but not limited to:

- fraud
- theft
- misappropriation of assets
- illicit and corrupt practices
- criminal breach of trust
- bribery
- unethical behaviour or improper conduct
- acts or omission endangering individual’s health or safety

- sexual harassment
- non-compliance with the laws, regulations, regulatory requirements etc. or any acts or omissions against the Company's interests
- disclosure of company's information without proper authorization
- abuse of position
- questionable and improper accounting
- breach of Companies' policies
- deliberate concealment of any of the above matters or other acts of wrongdoing
- profiteering as a result of insider knowledge
- misrepresentation or false statements to the staff or officer of the Company

### **Confidentiality and Anonymity:**

All whistle-blowing reports are treated as utmost confidential and or anonymous and not to reveal the whistle-blower's identity, to the extent permitted by law. The whistle-blower is to be given an assurance that his/her identity will be only known by a few top management staff on a need to know basis and for investigation purpose. The outcome of the investigation will be fed back to the whistle-blower. This is to encourage and give confidence to the whistle-blower that the complaint will be investigated. We could consider a reward to him/her if the company makes a big savings due to the complaint (based on a % basis) to encourage whistle blowing.

### **Acting in good faith:**

All whistle-blowing reports have to be made in good faith with reasonable belief that the information and allegation is true and not made with bad intention and not for personal gain; otherwise, disciplinary action may be taken against an employee whistle-blower.

This policy provides assurance that the whistleblower, if an employee of the Company, no action shall be taken against the whistleblower in accordance with Companies Act 2016 and Whistleblower Protection Act 2010. The whistleblower shall be protected against reprisals or retaliation and immunity from disciplinary action from the whistleblower's immediate superior or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:

- 1) Only genuine concerns are reported and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;
- 2) The disclosure is not made with malicious or ill will; and
- 3) The report is not made for personal gain or agenda.

## **Reporting Procedures:**

### **A) For employees to make reports**

For employees, any concerns should be raised to immediate superior or head of department.

If for any reason, it is inappropriate or impossible to do so, then the concerns should be reported directly to:

(i) Managing Director of the Company.

Name: Tan Heng Ta

Email: [tanht.group@gmail.com](mailto:tanht.group@gmail.com)

Mail: (mark, 'Strictly Confidential to be opened by Addressee only')  
Ralco Corporation Bhd  
No. 30-5, Jalan 4/146,  
Bandar Tasik Selatan,  
Off Jalan Sungai Besi,  
57000 Kuala Lumpur,  
Malaysia.  
Phone no.: 03-9058 0119

OR

(ii) General Manager of the Company

Name: Mr. Tan Su Khim

Email: [michael@ralco.net](mailto:michael@ralco.net)

Mail: (mark, 'Strictly Confidential to be opened by Addressee only')  
Ralco Corporation Bhd  
Lot 1476 Jalan Lengkok Emas 1  
Nilai Industrial Estate,  
71800 Nilai, Negeri Sembilan  
Phone no.: 06-797 1999

OR

(ii) Chairman of Audit Committee

Name: Mr. Ang Seng Wong

Email: [adrianangsib@gmail.com](mailto:adrianangsib@gmail.com)

Mail: (mark, 'Strictly Confidential to be opened by Addressee only')  
Ralco Corporation Bhd  
Lot 1476 Jalan Lengkok Emas 1  
Nilai Industrial Estate,  
71800 Nilai, Negeri Sembilan  
Phone no.: 06-797 1999

The report has to be in a form which does not endanger employee's confidentiality. If the complainant refuses to give supporting documents or evidence, then an investigation cannot proceed and the complaint could be considered false or an act of revenge. The employee complained against should be questioned, and if there is no further evidence then the employee concerned should not be unjustly punished over a false complaint. This is also a check and balance for both whistleblower and the person complained against.

Where appropriate, the matters raised may:

- make reference to the police;
- make reference to the external auditor;
- form domestic inquiry by the Head of Human Resource; and
- be investigated by the Whistle Blowing Committee, Internal Audit or the Managing

Director and/or the related person so authorized.

In case reporting to the management is a concern, then the concerns should be reported directly to the Chairman of Audit Committee.

Name: Ang Seng Wong

Email: [adrianangsib@gmail.com](mailto:adrianangsib@gmail.com)

Mail: (mark, 'Strictly Confidential to be opened by Addressee only')

Ralco Corporation Bhd  
Lot 1476 Jalan Lengkok Emas 1  
Nilai Industrial Estate,  
71800 Nilai, Negeri Sembilan  
Phone no.: 06-797 1999

#### **Attention: Chairman - of Audit Committee**

The report shall contain the following information:

- (1) Types of misconduct or wrongdoings
- (2) Name of person/persons involved
- (3) Time, location and dates of misconduct or wrongdoings occurred
- (4) How the misconduct or wrongdoings were perpetrated
- (5) Other witness to the misconduct or wrongdoings
- (6) Documentation or evidence available

#### **Reporting**

All reports received will be analysed by the Head of Internal Audit and further discussed with the Whistle Blowing Committee to decide on the next appropriate course of action. In on sequence of the investigation, the outcome will be tabled in the Audit Committee Meeting held quarterly. The Audit Committee or the Managing Director shall then report to the Board of Directors on reports and findings that require their attention and approval.

In the event of a serious case or for any other reason that the case cannot be discussed with the Whistle Blowing Committee, the Head of Internal Audit will discuss the matter with the Chairman and/or the Chairman of the Audit Committee.

## **WHISTLE BLOWING COMMITTEE**

1. Mr Tan Heng Ta
2. Mr Tan Su Khim and
3. Mr Ang Seng Wong

Each of the above-mentioned person is to sign an undertaking that they are obliged to discharge their duties in good faith, honesty and integrity. At the same time, will not disclose the confidentiality of information and identity of the reported individual.

## **Duties and Functions of Audit Committee**

All matters reported in rating of seriousness must be tabled to the Audit Committee, which is given the authority to:

- a) Ensure that effective implementation of the whistle blowing practices and appropriate structure, resources and systems are in place for
- b) Establish procedures for reporting and handling reports received from employees and stakeholders, including to:
  - i. Appoint the right person to handle reports received and maintenance of records;
  - ii. ascertain a verification method for the reports received;
  - iii. Recommend appropriate investigation approach to handle the reports received;
  - iv. Set procedures to prohibit reprisal by the Company to demote, threaten, harass or discriminate in any manner against any employee reported with good faith;
  - v. Safeguard confidentiality of information in relation to the report is maintained to its fullest as possible. Information shall be provided in such manner as to safeguard as much as possible the confidentiality of the identity of the reporting person; and
  - vi. propose an immediate and appropriate corrective action to be taken to the Board of Directors in consequence of the investigation.
- c) Report to the Board of Directors on reports and findings that required their attention and approval.

This policy has been adopted by the Board of Directors on 28<sup>th</sup> August 2019.