



ZECON BERHAD

(Company No. 134463-X)

ZECON GROUP'S WHISTLE BLOWING POLICY

**Approved and adopted by the Board of Directors of Zecon Berhad at its Meeting
held on 25 August 2018**

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1. INTRODUCTION

This Whistleblowing Policy forms part of our integrity, accountability and safety principles which are integral to Zecon Berhad and all its subsidiaries and associates (***the Group***) approach to business and daily operations.

This policy is not designed to question financial and business decisions taken by the Group in the normal course of its operations.

2. POLICY SCOPE

This policy applies to all employees of the Group, business associates, joint-venture partners, clients, contractors and subcontractors, suppliers and shareholders (***employees and stakeholders***).

3. POLICY STATEMENT

The Group's Whistleblowing Policy provides details on the reporting and handling of any concerns including unethical, unlawful and improper behaviour and conduct.

All business concerns raised are taken seriously and treated confidentially, and the identity of the whistle blower will be protected and will only be revealed on a strictly need-to-know basis or required by law. This policy ensures that an open working environment is maintained for any legitimate reporting and lay down the framework whereby employees and stakeholders should report matters of concern without the risk of subsequent victimisation, discrimination and disadvantage.

4. PROVISIONS OF THE POLICY

4.1. What To Report

The following acts or suspected misconduct are reportable under the Group's Whistleblowing Policy:

- Offence in breach of or failure to comply with statutory/regulatory/laws
- Bribery, corruption or fraud
- Abuse or misuse of power and office
- Improper or breach of financial reporting or accounting practice
- Endangerment of individual's health and safety
- Unauthorised use of the Group's properties
- Any action aiming at concealing any of the above

4.2 Reporting Procedures

4.2.1 Making A Report

The whistle blower who wishes to make a report should first consider speak to or submit a written report to the appointed personnel or to whistleblowing email at whistleblowing@myzecon.com by providing the following information:

- Name of whistle-blower (not applicable in the case of anonymous report)
- Contact details
- Details of person(s) involved
- Nature of allegation, time and place of the incident took place
- Provide evidence, if any to support the report

If the whistle-blower wishes to be remained anonymous, he or she should submit the report in a sealed envelope indicating “Strictly Private & Confidential” and to be addressed to:

The Independent Chairman of the Audit Committee
Zecon Berhad
Head Office
7th Floor, Menara Zecon, No.92 Lot 393
Section 5 KTL D, Jalan Satok
93400 Kuching, Sarawak, Malaysia

The Independent Chairman of the Audit Committee has been identified and appointed as the **Compliance Officer (CO)** authorised to receive all written and email reports raised by the whistle-blowers. The email whistleblowing@myzecon.com has been assigned to him exclusively.

4.2.2 Notification

The whistle-blower who has submitted his or her report will be notified by the CO within **5 working days** of receipt of the report via a written acknowledgement or an email, however, this is not applicable in the case of anonymous reporting.

4.2.3 Investigation

All whistleblowing reports received by the CO will be taken seriously and investigation will be conducted involving all relevant departments and parties if need be. The investigation team will maintain the confidentiality of the whistle-blower at all time unless required to disclose by law or strictly need-to-know basis.

All investigations will be conducted in accordance with the existing guidelines including standard operating procedures in relation to domestic inquiry, and relevant Labour Ordinance or Employment Act. However, it is also recognised that some concerns may be resolved without the need for a full-fledged investigation.

All investigations under the Whistleblowing Policy shall be completed within a reasonable period of time not more than 3 months after receiving such report and the CO will at the Group’s Audit Committee Meeting, finalise all issues raised in the whistleblowing reports and submit the summary to the Board of Directors Meeting.

4.3 Acting In Good Faith

The Group encourages its employee and stakeholder to report any concern in good faith. However, allegations made maliciously or in bad faith for personal gain may be subject to disciplinary action.

4.4 Confidentiality

All information provided in the whistleblowing reports will be treated with the highest level of confidentiality and will only disclosure or reveal such information if required to do so by law.

5. APPROVAL

This Policy was approved by the Board of Zecon at its meeting held on 25 August 2018.