

## **WHISTLEBLOWING POLICY**

### **1. POLICY STATEMENT**

- 1.1 CEKD Berhad and its Board of Directors are committed to the highest standards of transparency, accountability, professionalism and integrity for the conduct of its business activities. To ensure an open and positive corporate culture, CEKD Berhad and its subsidiaries (the “Group”) have implemented this Whistleblowing Policy (the “Policy”) as a legal framework to cultivate good corporate governance practices.
- 1.2 This Policy serves to encourage all Directors, employees, external parties and other stakeholders within and outside of the Group to come forward and raise their concerns about any unethical behaviour, malpractices, illegal acts and/or failure to comply with applicable laws, internal policy, rules and regulations within the Group.

### **2. SCOPE OF THE POLICY**

- 2.1 This policy aims to provide the standard guidelines to all Whistleblowers in disclosing any misconduct through an appropriate channel. Misconduct includes but is not limited to the below:-
  - Criminal offences (e.g. theft, forgery, fraud, corruption, money laundering, insider trading, etc.);
  - Bribery and blackmail;
  - Miscarriage of justice;
  - Abusive use of power, authority and control
  - Conflict of interests;
  - Sexual harassment;
  - Unauthorised disclosure, copy and/or use of trade secrets and confidential information of the Group;
  - Impropriety and misuse of the Group’s funds or resources;
  - Actions which endanger an individual’s and/or public’s health and safety;
  - Deliberate concealment of any malpractices or wrongdoings;
  - Non-compliance of law, regulations, the Group’s policies and procedures.
- 2.2 Whistleblowing reports must be genuine and made in good faith with reasonable belief that the information and allegations are substantially true, not frivolously or maliciously, and not for personal gain or interests; otherwise, disciplinary action may be imposed against the whistleblower.

### **3. PROTECTION TO WHISTLEBLOWERS**

- 3.1 The Board and the management give their assurance that all allegations reported will be treated with utmost confidentiality and shall not be disseminated to third parties, including the identity of the whistleblower raising a concern. Prior consent of whistleblower will be sought should there a need to divulge identity for investigation purpose or required by law.

## CEKD BERHAD

(Co. No: 201801023077 (1285096-M))  
(Incorporated in Malaysia)

- 3.2 Pursuant to the Whistleblower Protection Act 2010, all whistleblowers shall be protected and not be at the risk of any kind of reprisal, threat, harassment, retribution, or victimization (“detrimental action”) from their superiors or from any party within the Group due to their disclosure, provided the disclosure be made in “good faith”, free from malicious intent and on “reasonable grounds” for believing it is true.
- 3.3 The Group will not tolerate any detrimental action against the whistleblower who has made a good faith disclosure in accordance to this policy. Any such detrimental action is considered a serious breach of this policy and shall be subject to disciplinary action, which could result in suspension without pay or dismissal.
- 3.4 The Group reserves the right to revoke the whistleblower’s protection if found to have
- committed an act of misconduct; and
  - the disclosure was not made in good faith.

Written notice will be given to the whistleblower about the revocation of protection.

## 4. PROCEDURE IN MAKING A DISCLOSURE

- 4.1 All whistleblowers are advised to promptly report and disclose to the Risk Management Committee (RMC) if there is a reasonable belief or suspicion that a misconduct has taken place / is taking place / going to take place.
- 4.2 A disclosure can be made to the Chairman of RMC by post or via email as below:

By post	Via email
Attention: Chairman of Risk Management Committee Address: 10, Jalan 1/137B, Resource Industrial Centre, Batu 5, JLN Kelang Lama, 58200 Kuala Lumpur.  Shall be submitted in a sealed envelope CLEARLY marked “ <b>Strictly Confidential to be opened by the addressee ONLY</b> ” on top right-hand corner.	Attention: Chairman of Risk Management Committee  Email: admin@cekd.com.my

- 4.3 All whistleblowers are encouraged to provide their particulars, i.e. name, NRIC No., designation (if he/she is the employee of the Group) and contact details (email and mobile phone) to facilitate the investigation. Whistleblower Protection will not be accorded for whistleblower who elects to remain anonymous pertaining to the complaint or allegation.

**CEKD BERHAD**

(Co. No: 201801023077 (1285096-M))  
(Incorporated in Malaysia)

- 4.4 The RMC will set up an investigation team as soon as receiving the written complaint or allegation of misconduct for further action and investigation. A proper investigation would determine how genuine is the report received. The entire investigation process shall be conducted in a confidential, accurate, fair and impartial manner.
- 4.5 The whistleblower or any person who is involved in the investigation process shall not disseminate any information, including the status or outcome of an investigation to third parties.

**5. ANONYMOUS COMPLAINT OR ALLEGATION**

The Group generally will not entertain any anonymous report so as to prevent frivolous and vexatious complaint or allegations. However, the Group reserves the right to investigate anonymous whistleblowing reports depending on the nature and seriousness of the disclosure.

**6. REVIEW AND APPROVAL OF THE POLICY**

- 6.1 The Board may review and amend this Policy from time to time, or as and when necessary, to ensure its relevance and significance.
- 6.2 The RMC shall annually review and update this Policy before forwarding to the Board for approval. Changes to the policy shall be made and approved in writing by the Board. All employees and stakeholders shall be informed via email or in writing for any changes in this Policy.

This Policy is reviewed and approved by the Board of Directors on 24 Aug 2021