

ECO Medi Glove Sdn. Bhd. 200801013973 (815262-D)

Plant 1 : Lot 32586, No. 118, Jalan Logam 7, Kamunting Raya Industrial Estate, 34600 Taiping. Perak Darul Ridzuan. **MALAYSIA**

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Plant 3 : PT 33500, Jalan Perusahaan 1, Kawasan Perusahaan Kamunting 34600 Taiping, Perak Darul Ridzuan, **MALAYSIA**

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SST NO. : A11-1808-21015730

Title: Policy and Procedure on Whistleblowing		
Doc No: HR-13	Rev No: 03	Rev Date: 03/01/2023

1. Objective

- 1.1. It is the duty of each stakeholder (pls refer below [1] for definition) of ECO Medi Glove Sdn. Bhd. ("The Company") to raise genuine concern in relation to criminal activity, breach of a legal obligation (including negligence, breach of contract, and contravention of Administrative Law), miscarriage of justice, danger to health and safety, or the environment and the cover up of any of these in the workplace. It applies whether or not the information is confidential.
- 1.2. This process of voicing wrong doings is generally referred to as "Whistleblowing". The person raising concerns is referred to as the "whistleblower" and the person against whom the concern is raised is referred to as the "whistleblowee".
- 1.3. The Company is committed to ensure concerns of this nature will be taken seriously & investigated. A disclosure will be protected if the whistleblower has an honest & reasonable suspicion that the malpractice has occurred or is likely to occur. A member who raises concern(s) reasonably and responsibly will not be penalized in any way.
- 1.4. The reporting channel on Whistle Blowing should be in the following manners to ensure fair treatment is given to the whistle blower:
 - 1.4.1. If the whistle blowee is a person within the Board:

The Chairman of the Board and the AC must be channeled to deal with the matter regardless of the significance of the concern raised.
 - 1.4.2. If the whistle blowee is a person outside of the Board:

The Chief Executive Officer ("CEO") of the Company will be channeled to deal with the matter. The CEO may setup Whistle Blowing Committee ("WBC") and delegate the authority/power to a WBC or alternatively to the Chairman of the Audit Committee to conduct an investigation, as he deemed fit.

All findings should then be reported to the AC accordingly on the need basis or on quarterly basis.

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2. Step By Step Procedural Guidelines

2.1. Definition for "stakeholder"

This is intended for the stakeholder of the Company. This is someone who is :-

- a) Employed on a permanent/fixed term contract of employment.
- b) On secondment.
- c) On a temporary contract or employed through an agency to work for the Company.
- d) An independent consultant of the Company.
- e) Contractors & Suppliers of the Company.
- f) Holding shares in the Company
- g) A customers of the Company.
- h) In any way connected to the Company by mean of a business relationship.
- i) Job seekers.
- j) General public.

2.2. Issues that can be raised under this policy

The concerns are as follows:

- k) Malpractice/ill treatment of a client/customer/employee by any member of the staff.
- l) Repeated offences despite a complaint being made.
- m) A criminal offence has been committed, is being committed, or is likely to be committed.
- n) Suspected fraud.
- o) Disregard for legislation, particularly in relation to health & safety at work.
- p) Breach of statutory regulations and financial policies and measures,
 - Statutory Reporting Requirement.
 - Insider Trading.
 - Established internal financial policies, controls & measures.
- q) Showing undue favoritism over a contractual matter or to a job applicant.
- r) A breach of any code of conduct or protocol.
- s) Information on any of the above has been/is being or is likely to be concealed.

2.3. Confidentiality protection for the whistleblower

We encourage the whistleblower to identify him/her and assure him/her that every

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effort will be made to ensure confidentiality of the identity. In the event of being unable to maintain the anonymity of the whistleblower additional measure will be considered within the rights of the whistleblower, e.g. leave of absence, temporary relocation etc.

2.4. Petty, malicious accusations & repercussions

If the whistleblower makes allegations in good faith, but is not subsequently confirmed by the investigation, no action will be taken against that person. If, however, malicious or vexatious allegations are made, disciplinary action may be taken against that person.

2.5. Communicating a concern

The reporting employee could initially approach the immediate supervisor. If, however the employee does not feel comfortable about doing so, or feels inadequate action was taken after the concern was communicated, he/she could approach the CEO, to voice his/her concerns. Facilities have been provided to ensure this communication will be in strictest confidence. The whistleblower is encouraged to communicate the information in person, but could also use other means (i.e., phone, email, letter etc.). Please refer to APPENDICES 2 & 4 for communication channels and format of the report respectively.

2.6. Details to include in the communication

The whistleblower is invited to provide the background and history of their concern, giving names, dates & places where possible. Although they are not expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for the concern.

2.7. Subsequent investigation & action process

The action will depend on the nature of the concern. It may be:

- Investigated internally by the CEO/AC Chairman and/or WBC depending on who thewhistleblowee is,
- Be referred to the policy,
- Be referred to the external auditor,
- Form the subject of an independent inquiry,

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Subject to legal/confidentially constraints the issue raised will be communicated to the whistleblower as well and an opportunity given to hear his/her defense. The CEO/AC Chairman and/ or WBC will discuss an appropriate action should a disciplinary action is required.

2.8. Audit Committee involvement

Except if the whistleblowee is a person within the Board, it should be noted that regardless of the significance of the concern, or outcome, all of this will be communicated to the Audit Committee, by the CEO and/ or WBC. This will be done in the form of a quarterly summary report. The AC comprises entirely of Non-Executive Independence directors who do not have any operational connection with the Company or its employees and hence are in a position to appraise the issues without unfair prejudice or bias.

2.9. Update of progress of the investigation

2.10. If possible, subject to confidential/legal constraints, the persons concerned (whistleblower & whistleblower) will be informed of the progress & outcome of the issue raised. A formal report will be issued as a result of any investigations conducted and subject to confidential/legal restrictions this will be communicated to the whistleblower & whistleblower and their views will be taken into consideration.

2.11. Assistance to the Whistleblower-during court proceedings (if any)

The Company undertakes to minimize any difficulties the whistleblower may experience as a result of raising the concern. For instance, if required to give evidence in a criminal or disciplinary proceedings, they will be advised on the procedure. If an employee of the Company is subject to a civil suit, the Company will assess the assistance to be given on a case by case basis.

2.12. Protection for whistle blower

To ensure that this policy is effective, and to assure the whistleblower that their concerns will be taken seriously the Company will:

a) Not allow the whistleblower, if he/she is an employee of the Company to be unfairly victimized or subject to adverse personnel action, it being:

- Removal,
- Demotion,

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- Suspension,
 - Transfer/Re assignment,
 - Adverse performance evaluation,
 - Adverse decisions concerning pay/benefits/awards,
 - Adverse decisions concerning training/development,
 - Other significant changes in duties/responsibilities, working conditions etc.
- b) Treat victimization of the said employee as a serious matter, leading to disciplinary action that may lead to dismissal of the victimizer.
- c) Not attempt to conceal evidence of poor or unacceptable practice.
- d) Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct.
- e) Ensure confidentiality clauses in employment contracts do not restrict, forbid or penalize whistleblowing.
- f) During the internal handling of a reported offence, the IA/Ac will decide if an external party should be notified.
- g) Before, during, and after the internal handling of the concern raised, the reporting employee shall refrain from seeking or giving internal or external publicity.
- h) This will be strictly enforced by the Company to protect the reputation of the Company and its Stakeholder's interests.

2.12. Regular review of effectiveness of policy

The Company undertakes to review the policy regularly for effectiveness and will take into consideration any feedback from the stakeholders to improve it further.

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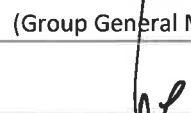
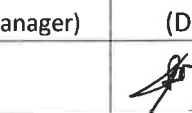
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3. Concluding Summary

To summarize:

- Every individual is duty bound to report wrong doing.
- All communications will be treated confidentially as far as possible.
- Protection will be given to the whistleblower & whistleblowee for genuine issues raised in good faith, to the maximum possible extent.
- A concern which is later proved unfounded will not penalized either party (whistleblower or whistleblowee) providing it was in good faith.

The English language version of this Policy shall prevail in case of any inconsistencies with translated versions.

	Prepared By:	Verified By:	Approved By:
Name/Position	Masuria Yacob (HR Manager)	SP/Lim (Group General Manager)	WK Lee (Director)
Signature			
Date	03.01.2023		

Appendix 1

Benefits:

1. To a certain extent it will deter the whistleblower from reporting to external parties, thus affecting the Company's reputation.
2. May alert the Company to wrongdoings at all levels previously unknown either because of misguided trust or lack of proper supervision.
3. Generally, major company scandals in the past have started from minor misdemeanors which if gone undetected may encourage the whistleblowee to keep trying to test the maximum extent possible before detection.
4. Genuine employees may leave the Company if they perceive that the supervisor is dishonest/being unfair rather than complain and subsequently victimized by the same if they feel they may not get a fair hearing & the investigation is not properly handled.
5. A dishonest senior could persuade a junior staff to collude in fraudulent activities & if the staff is inexperienced he/she could fall in line with the senior's wrongdoings if there is no visible and trusted line of option available to report the senior.
6. If the whistleblowee is aware that there is a channel for wrongdoings to be reported by their colleagues & investigated upon, they may feel less inclined to take advantage of the opportunity to commit such acts.

Appendix 2

Communication of Whistleblowing Policy to Stakeholders

To the employee:

This will be done by means of:

- Workshops, Training Sessions and HR announcements disseminated to every employee of the Company.
- The briefing for newcomers by the HR department will also cover the Whistle blowing topic.
- To avoid abuse of the policy, for e.g. employees making malicious/petty accusations, there will be continual training and awareness programs by HR department so that the purpose is understood and utilized accordingly.

To the supplier/contractor/agent:

An explanatory letter will be issued to Key Business Partners informing them of our whistleblowing policy.

To the customers/shareholder/general public/stakeholders/job seekers:

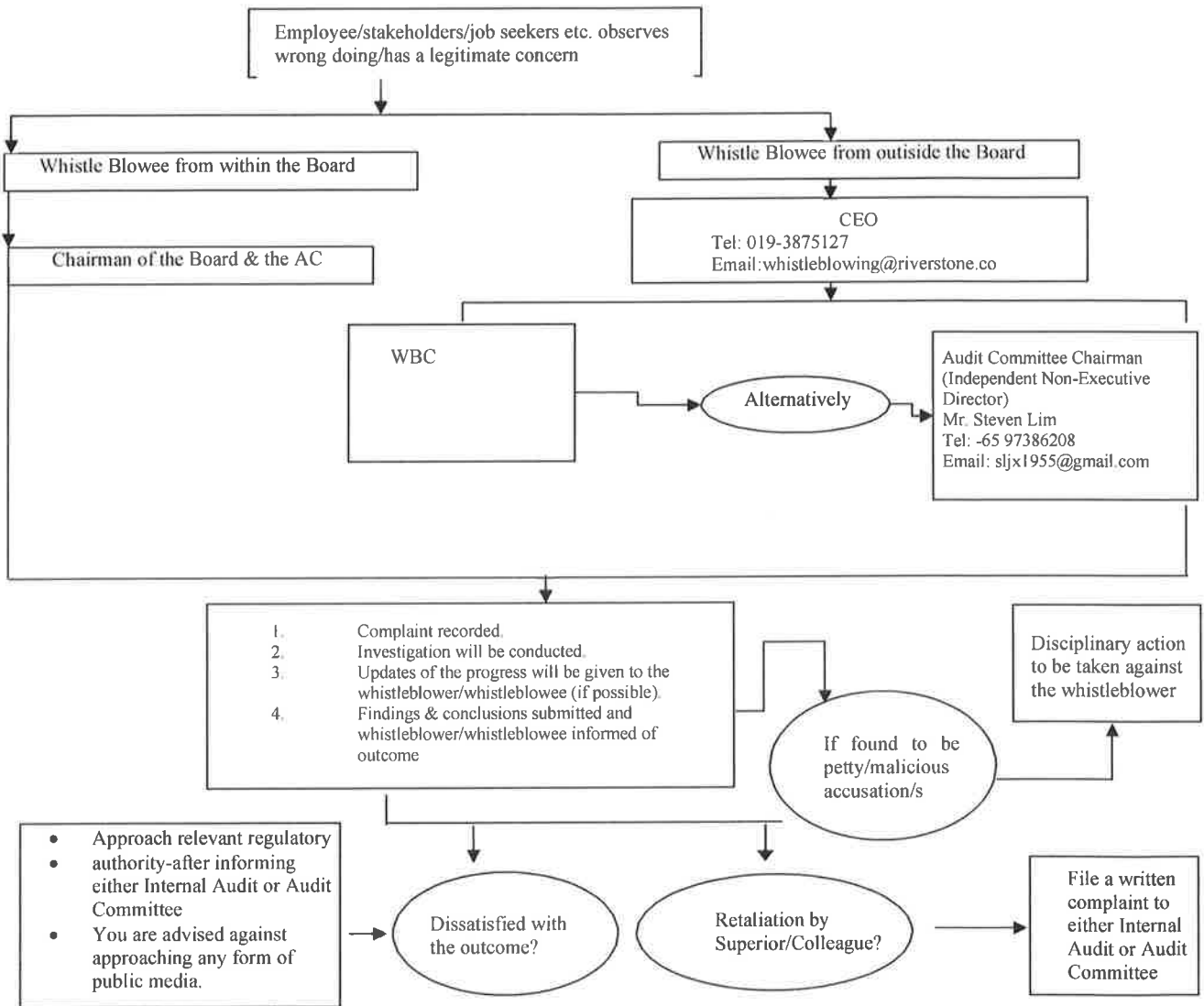
A brief summary will be posted on the Company external website giving details of the policy & communication channels for reporting wrong doings. This will be monitored by CEO & access given to the Audit Committee as well. Any information meriting further inquiry will be handled by the CEO/AC chairman and/or WBC with the Audit Committee involvement.

Whistleblowing Policy-Reporting procedures

Appendix 3:

Communication Channels

This is a summary guide of the more detailed whistleblowing policy, *mainly to direct any employee* with a legitimate concern that requires a hearing, to the relevant person in charge of the whistleblowing procedure.



Appendix 4: - Whistleblowing Form

Date of submission of report: Time of report:			
Date of incident(s):	Time of incident(s):		Location of incident(s):
Nature/Description of incident: <i>(Please give a brief narration)</i>			
Name(s) of person(s) reported on, and their respective departments:			
**Names & Signature of Reporting Party (ies):		Name & Signature of Recording Party (ies): <i>(if applicable)</i>	
**Employee Number: Department: NRIC Number:		Employee Number: Department: NRIC Number	

***Optional information, Whistleblower has an option to disclose or stay anonymous*