



# **KYM HOLDINGS BHD.**

## Whistleblowing Policy

<b>KYM Holdings Bhd. (84303-A)</b>  <b>Whistleblowing Policy</b>	Document No.:	
	Issue No.:	01
	Rev. No.:	01
	Date:	08.11.2019

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## 1. PURPOSE

The Whistleblowing Policy is intended to provide all directors and employees of KYM Holdings Bhd (“KYM” or “Company”) and its subsidiaries (“Group”) a platform to raise concerns or disclose any wrongdoing that may adversely impact the Company without fear of suffering retribution and to provide a transparent and confidential process for dealing with concerns.

## 2. TYPES OF MISCONDUCT/WRONGDOINGS

The list of concern / misconduct / wrongdoings includes, but not limited to:

- Fraud or criminal offences;
- Corruption or bribery;
- Abuse of power;
- Conflict of interest;
- Misuse of company information;
- Misappropriation or theft of the funds, supplies or company’s assets;
- Questionable and improper accounting;
- Improprieties/irregularities.
- Sexual harassment;
- Non-compliance with any provision of the Code of Conduct and Ethics, legal or regulatory requirements.

## 3. CONFIDENTIALITY AND ASSURANCE AGAINST RETALIATION

All disclosures made under this Policy will be dealt with in a confidential manner. Every effort will be made to treat the whistleblower’s identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the whistleblower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by a court of law.

The Company will not tolerate the harassment or victimization of anyone raising a genuine concern. The Company will ensure that no one will be at risk of suffering some form of retribution as a result of raising a concern, even if he/she is mistaken. The Company does not however extend this assurance to someone that maliciously raises a matter that is known to be untrue.

## 4. ACTING IN GOOD FAITH

All disclosures 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.

## 5. WHISTLE BLOWING PROCEDURE

5.1 If any employee believes reasonably and in good faith that unethical behavior, misconduct, malpractice or illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future, he or she should report this immediately to his or her immediate superior. However, if for any reason it is believed that this is not possible or appropriate, then the concern should be reported to either the:

(1) **Chairman of the Company**

Name: Dato' Seri Dr. Isahak bin Yeop Mohamad Shar

Email:

Mail: Mark, **Strictly Confidential to be opened by Addressee only**  
KYM Holdings Bhd  
Level 17, KYM Tower, No. 8  
Jalan PJU 7/6, Mutiara Damansara  
47800 Petaling Jaya  
Selangor

or Attention: Chairman of the Company

(2) **Senior Independent Director**

Name: Dato' Seri Ir. Mohamad Othman bin Zainal

Email:

Mail: Mark **Strictly Confidential to be opened by Addressee only**  
KYM Holdings Bhd  
Level 17, KYM Tower, No. 8  
Jalan PJU 7/6, Mutiara Damansara  
47800 Petaling Jaya  
Selangor

Attention: Senior Independent Director

5.2 Report / Disclosure under this Policy can be made through email or mail using the attached form as per Appendix I addressed to the above persons.

5.3 Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

5.4 The Company reserves the right to investigate any anonymous disclosure made.

## 6. ACTION

5.1 All complaints / disclosures received would be placed before the Audit Committee for its action.

6.2 The Internal Auditor shall be the named Investigator unless the Audit Committee assigns / appoints another Investigator. The Investigator must be impartial and independent of all parties concerned. The Investigator is required to report all concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Audit Committee for deliberation.

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6.3 The Audit Committee shall report to the Board of Directors on reports and findings that required their attention and approval.

## 7. REVIEW OF POLICY

This policy is overseen by the Audit Committee to ensure that the policy meets the requirements of the relevant legislations in place, and remains effective for the Group. Where necessary, changes to the policy will be made, subject to the approval of the KYM Board of Directors.

This Policy was approved by the Board of Directors of KYM on 18 December 2017.

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**APPENDIX 1**

**WHISTLEBLOWING FORM**

<b>WHISTLEBLOWING REPORT</b>		
To:		
Incident Date & Time	Date:	Time:
Incident Location		
Name of alleged person/division/department		
Description/ Circumstances of alleged incident (Please use additional sheets if necessary)	<ul style="list-style-type: none"> <li>• What, Who, When, Where, How, Witness</li> <li>• Please provide evidence to support the claim</li> </ul>	
Signature	:	_____
Name	:	_____
Dept/Div/Co	:	_____
Telephone No	:	Office _____ Mobile _____
Email address	:	_____
Date	:	_____
	:	_____