



SACOFA SDN BHD
Registration No: 200101017148 (552905-P)
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY

1.0 SACOFA'S WHISTLE-BLOWING MECHANISM

- 1.1 To further support the efforts by Sacofa Sdn Bhd ("SACOFA") and its group of subsidiaries (the "Group") in driving towards better corporate governance, SACOFA has established a whistle-blowing mechanism, governed through this Whistle-blowing Policy (this "Policy").
- 1.2 It is a safe and effective channel for our employees, parties dealing with us, our customers, and the public to report to SACOFA any observed behavioural inconsistencies and/ or malpractices such as, but not exhaustive to: -
 - 1.2.1 abuse and theft;
 - 1.2.2 breach of contract;
 - 1.2.3 negligence resulting in substantial loss and/ or specific danger to public health and safety;
 - 1.2.4 manipulation of company data/ records;
 - 1.2.5 financial irregularities, including fraud or suspected fraud;
 - 1.2.6 Criminal offence;
 - 1.2.7 pilferage of confidential/ proprietary information;
 - 1.2.8 bribery and corruption;
 - 1.2.9 deliberate violation of law and regulation;
 - 1.2.10 wastage and/or misappropriation of company funds/ properties;
 - 1.2.11 breach of SACOFA's Code and policies; and
 - 1.2.12 any other unethical, biased favoured, imprudent event, which is not accordance with the general standards of business ethics.
- 1.3. This Policy is not intended to cover the following:
 - 1.3.1. general complaints about the Group's products or services;
 - 1.3.2. matters which are trivial or frivolous or malicious or vexatious in nature or motivated by personal agenda or ill will; and
 - 1.3.3. matters pending or determined through any tribunal or authority or court, arbitration, or other similar proceedings.

2.0 GUIDING PRINCIPLES FOR THIS POLICY

In relation to this Policy, SACOFA will abide by the following guiding principles: -

- 2.1. The SACOFA Group is committed to conducting its business in a lawful and ethical manner.



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- 2.2. SACOFA expects malpractices including wrongdoings, misconduct, illegal acts, unethical behaviour, or unethical business practices to be reported to SACOFA.
- 2.3. All the Group's employees, internal and external stakeholders, and the general public are encouraged to report genuine concerns regarding malpractices involving SACOFA's operations or personnel.
- 2.4. Whistle-blowing disclosures (the "Disclosure") shall be investigated with impartiality.
- 2.5. SACOFA shall protect the identity of the whistle-blower, within the ambit of applicable law, and that he/she shall not be victimised or reprimed by the Group or its personnel for making the Disclosure.
- 2.6. SACOFA shall also protect those who are responsible for processing, investigating, and deliberating on the whistle-blowing disclosure and they shall not be victimised by the Group or its personnel in managing the Disclosure.
- 2.7. Threat and victimization are considered as serious gross misconduct which may result in serious disciplinary action.
- 2.8. Complete confidentiality shall be maintained for all Disclosures made in accordance with this Policy.
- 2.9. There shall be no attempt to conceal evidence of the Disclosure.
- 2.10. Opportunity of being heard shall be accorded fairly and equally to all persons including the alleged wrongdoer.

This Policy is intended to complement the internal communication channels of the Group's grievance mechanism and procedures. Stakeholders shall first consider communicating or raising their concerns via the internal communication channels, if applicable. If the concerns remain unresolved or it is deemed that the concerns require the attention of higher authorities within the Group, the stakeholder shall use this whistle-blowing mechanism for escalation or reporting.

Although SACOFA will treat every report received seriously, actions may also be considered against the whistle-blower if the Disclosure is found to be a deliberate attempt to shame or humiliate another party, or not made in good faith.



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3.0 HOW TO REPORT

3.1. A person who, in good faith, reasonably believes or suspects a malpractice or misconduct is taking place, has taken place, or may take place in the future, shall report as soon as he or she has established reasonable grounds for believing or suspecting so, together with the relevant information or document.

A whistle-blower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a Disclosure.

3.2. Anonymous whistle-blowing is not prohibited. Nevertheless, the extent to which a Disclosure can be investigated may be limited to the information provided.

3.3. A Disclosure can be made in writing, orally, or via email.

3.4. A Disclosure shall be made to the following Prescribed Functions.

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| Head of Human Capital |
| Email : Employee.whistleblower@sacofa.com.my |
| No : +6082-416000 |
| Managing Director |
| Email : Employee.whistleblower@sacofa.com.my |
| No : +6082-239603 |

For all Disclosures made via email to the Prescribed Functions, the email shall be addressed to the dedicated whistle-blowing email address provided above, which is accessible by all authorities stated above.

For any Disclosures made via phone calls, orally, or in writing, the authorised persons for the Prescribed Functions, whomever the Disclosure is addressed to, shall ensure documentation is kept and they are generally required to inform all Prescribed Functions of the Disclosure.

3.5. If making a Disclosure to Management is a concern, the Disclosure may be made directly to any of the following Non-Executive Directors of the Board Audit Committee.



SACOFA SDN BHD

Registration No: 200101017148 (552905-P)
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Board Audit Committee Chairperson

Name : YBhg. Datuk Kamal bin Khalid
Email : Director.whistleblower@sacofa.com.my
No. : +603-7200 2222

Board Audit Committee Member

Name : YBhg. Dato Sri Dr. Haji Wan Lizozman bin Wan Omar
Email : Director.whistleblower@sacofa.com.my
No. : +6082 - 440442

Board Audit Committee Member

Name : Tuan Haji Mersal bin Abang Rosli
Email : Director.whistleblower@sacofa.com.my
No. : +6082 - 441686

For all Disclosures made via email to a Non-Executive Director of the Board Audit Committee, the email shall be addressed to the dedicated whistle-blowing email address provided above, which is accessible by all Non-Executive Directors stated above.

For any Disclosures made via phone calls, orally, or in writing, the Non-Executive Director, whomever the Disclosure is addressed to, shall ensure documentation is kept and they are generally required to inform all other above-stated Non-Executive Directors of the Disclosure.

- 3.6 If making a Disclosure to Management and even the Non-Executive Directors of SACOFA is a concern, the Disclosure may be made directly to the Senior Independent Board Group Chairman of Cahya Mata Sarawak Berhad (“CMSB”), a major and substantial shareholder of SACOFA.

In relation to all Disclosures made to the Senior Independent Board Group Chairman of CMSB, the policies and procedures of CMSB shall prevail.

4.0 ACTIONS IN RELATION TO THE DISCLOSURE

- 4.1. All Disclosures made via **Paragraph 3.4** shall be notified to the Managing Director.



SACOFA SDN BHD

Registration No: 200101017148 (552905-P)
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Where a Disclosure involves a Senior Management personnel, the Disclosure shall be reported to the Board Audit Committee as soon as practicable.

- 4.2. All Disclosures made via **Paragraph 3.5** shall be notified to the Board Audit Committee.
- 4.3. Generally, the Internal Audit function shall assist in the investigation of the Disclosures made via **Paragraph 3.4** or **3.5**. That said, the Managing Director or the Board Audit Committee, whichever is applicable, may engage independent third parties to assist in any part of the Disclosure handling process.
- 4.4. Personnel involved in the Disclosure handling process, including investigation and deliberation, shall be objective and independent from those allegedly involved in relation to the Disclosure.

5.0 BEING INFORMED AND HAVING THE OPPORTUNITY TO BE HEARD

- 5.1. A whistle-blower may be informed of the status of his/her Disclosure, including the outcome of the deliberation, as far as reasonably practicable.
- 5.2. The alleged wrongdoer, which may include the whistle-blower in the event the whistle-blower is implicated or discovered to be involved in the allegation, may be asked to attend a meeting to discuss the allegations and he/she shall take all reasonable steps to attend the meeting. He/she shall be given an opportunity to answer the allegation.
- 5.3. If an investigation is conducted on a whistle-blower who is implicated or discovered to be involved in the allegation, it shall not be treated as a reprisal against the whistle-blower but a facilitation of fact-finding and decision making.

6.0 CONFIDENTIALITY AND PROTECTION FROM REPRISAL

- 6.1. All Disclosure received will be treated strictly as confidential, unless otherwise required by law or for purpose of any legal proceedings.
- 6.2. The whistle-blower's identity shall be protected, unless otherwise is required by law.



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- 6.3. The Disclosure, the whistle-blower's identity, and details of work associated with the Disclosure shall only be revealed to persons involved in the investigation and related proceedings on a "need-to-know" basis.
- 6.4. A whistle-blower will be protected from reprisal within the Group as a direct consequence of the making of the Disclosure. A reprisal includes disciplinary actions, termination, demotion, negative evaluation, loss of remuneration and bonus, and withholding of promotion. Such reprisal actions, if proven, will be treated as serious gross misconduct.

7.0 REVIEW OF THIS POLICY

This Policy is approved by the Board of SACOFA on 15th May 2020.

This Policy shall be reviewed by the Company periodically or at least once in three years.