



WINTONI GROUP BERHAD  
Registration No: 200701008533 (Company No. 766535-P)  
(Incorporated in Malaysia)

## WHISTLE BLOWING POLICY

**Wintoni Group Berhad** (the “**Company**”) is committed to achieving the highest possible ethical standards in all of its practices. To achieve these means it encourages freedom of speech. All of us at one time or another has concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice or dangers to the **Company** or the environment, it can be difficult to know what to do.

Employees may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling that it is none of their business or that it is only a suspicion. Employees may feel that raising the matter would be disloyal to colleagues, managers or to the **Company**. Employees may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The **Company** has introduced this policy to encourage all employees to release any information that is evidence of illegal, immoral conduct or malpractices in the **Company**.

### **Assurance**

The Board of Director is committed to this policy. If employees raise a genuine concern under this policy, they will not be at risk of losing their job or suffering any form of victimization. Provided they are acting in good faith, reasonably believe that information and any allegations contained in it are substantially true and they are not acting for personal gain. The **Company** does not extend this assurance to someone who maliciously raises a matter they know are untrue. The **Company** will not tolerate the harassment or victimization of anyone raising a genuine concern however the **Company** recognise that an employee may nonetheless want to raise a concern in confidence under this policy. The **Company** will protect the identity and will not disclose it without the employee’s consent.

### **How to Raise a Concern**

If the employee has a concern about malpractice, they could raise it with his/her own or any other Head of Department or the Managers or the Executive Director whoever is comfortable to the employee. This may be done orally or in writing such as using e-mail or existing suggestion box. If the particular employee feels unable to raise the matter to the above channels for whatever reason, then

they may raise the matter directly to the **Chairman of Audit and Risk Management Committee, Mr. Ah Kow @ Choo Ah Kow** by email to **choozewah@gmail.com**

## **Respond**

If the concern is raised verbally, the person receiving the information should put it in writing as soon as is practicable to ensure that it properly reflects the concerns that have been raised. The employee must also indicate if the concern is to be treated in confidence. The person receiving the information will make judgment of that confidence before disclosing it to other person. Where appropriate, the matter raised may involve an internal inquiry or more formal investigation, be referred to the police or be referred to the external auditor. Subject to any legal constraints, the relevant employees will be informed of the final outcome of any investigation. However, the **Company** may not be able to tell the precise action taken where this would infringe a duty of confidence owed by the **Company** to someone else.

## **What is Malpractice or Wrongdoing?**

Malpractice and Wrongdoing will include the following. This is not, however a comprehensive list but is intended to illustrate the sorts of issue, which may be raised under the 'Whistle Blowing Policy':

1. Any unlawful act which is an offence or breach of civil/ criminal law.
2. Any failure to comply with appropriate professional standards or with a legal obligation.
3. Breach of trust, fraud, corruption or dishonesty.
4. Damage to the environment.
5. Health and safety risks to the public as well as employees.
6. Unauthorised use of **Company**'s fund.
7. Actions which are likely to cause significant loss or damage to **Company**'s income or property including misappropriation of assets, questionable or improper accounting.
8. Failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost or loss of income to the **Company**.
9. Abuse of power or the use of powers and authority for any unauthorized purpose.
10. Discrimination in the **Company**'s employment or services.
11. Action which considered as causing sexual harassment or physical abuse or danger to any person.
12. Breach of **Company**'s Group Policies and Authorities.
13. Misuse of **Company**'s confidential information.
14. Actions which are unethical, unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.

## **Administration**

The identified Senior Management or his designate is responsible for the administration, revision, interpretation and application of this policy. The policy will be reviewed periodically and revised as needed.