

WHISTLEBLOWING POLICY

1.0 **Purpose**

To encourage employees to disclose genuine concerns of malpractice or misconduct in their work place and to provide protection for employees who report allegations of such malpractice and misconduct.

2.0 **Scope**

The policy applies to all employees, including full-time, part-time and temporaries, and agents, contractors, suppliers and customers of Lingkaran Trans Kota Holdings Berhad and its subsidiaries and associates (Litrak Group).

3.0 **Policy**

3.1 The whistleblowing policy is primarily for concerns where the interests of others or the Group are at risk. It is designed to encourage employees to report alleged malpractices or misconduct, to ensure that all allegations are thoroughly investigated and suitable action taken where necessary.

3.2 An employee, who had acted in good faith, is protected against adverse employment actions (termination, demotion, suspension, harassment, or other forms of discrimination) for raising allegations of malpractice or misconduct.

3.3 On the other hand, if an employee were maliciously to raise a matter which he / she knew to be untrue, it would be likely to constitute gross misconduct, and would be dealt with under the Company's Disciplinary Procedures.

3.4 Every effort will be made to protect the anonymity of the whistleblower; however there may be situations where it cannot be guaranteed.

3.5 **Malpractice and misconduct**

Below are some examples of malpractice or misconduct:

- (i) Unprofessional treatment of agents, contractors, suppliers or customers by an employee.
- (ii) Criminal offence.
- (iii) Corrupt practice.
- (iv) Defrauding any company in Litrak Group.
- (v) Sexual Harassment.
- (vi) Miscarriage of justice.
- (vii) Endangering the health and safety of any individual.
- (viii) Breach of standing financial instructions.
- (ix) Breach of employee's code of conduct.
- (x) Deliberate concealment of any of the above.



WHISTLEBLOWING POLICY

4.0 Responsibilities and Accountabilities

4.1 Employee:

- (i) to raise any malpractice or misconduct issue with his/her Manager / Head of Department / Head of Group Legal & Secretarial / Head of Group Internal Audit in person or in writing.
- (ii) to write to the Chairman of the Audit Committee if the employee believes he/she is being penalized in any way for whistleblowing or who believes that there has been cover up of the action disclosed.

4.2 Manager / Head of Department / Head of Group Legal & Secretarial / Head of Group Internal Audit:

- (i) to ensure any malpractice or misconduct issue reported by the employee must be speedily investigated and to notify Human Resource and Admin Department for further action.

4.3 Human Resource and Admin Department:

- (i) to take appropriate disciplinary action against the responsible individual(s) if the claim of malpractice or misconduct is substantiated.

5.0 Procedures

5.1 An employee who reasonably believes that a malpractice or misconduct is occurring should raise the issue with any of the following persons:

- (i) his/her Head of Department.
- (ii) Head of Group Legal & Secretarial or Head of Group Internal Audit.

5.2 This may be done in person or in writing. If in writing, the nature of concern, the reason for making the disclosure and the details of the individual or party under suspicion should be clearly stated.

5.3 All incidences of whistleblowing to a Designated Executive have to be reported to any Executive Director, or Chairman of the Audit Committee.

5.4 Protection for Whistleblower

5.4.1 Employees who believe they are being penalized in any way for whistleblowing or who believe that there has been cover up of the action disclosed should write to the Chairman of the Audit Committee.

5.4.2 If requested by the whistleblower all reasonable steps will be taken to protect the anonymity of the whistleblower. However under certain circumstances to assist with the investigation the individual's identity may



WHISTLEBLOWING POLICY

become known or needs to be revealed but approval will be sought from the whistleblower first for disclosure of the individual's identity.

5.6 Disciplinary Action

5.6.1 If the claim of malpractice or misconduct is substantiate, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of employment.

5.6.2 An act of retaliation or victimization against the whistleblower will result in disciplinary action, up to and including termination of employment.

5.6.3 The malicious use of the whistleblowing policy will result in disciplinary action against the whistleblowing complainant, up to and including termination of employment.