

## THE PINTARAS GROUP

WHISTLEBLOWING POLICY MAY 2020



#### Introduction

- 1.1 Pintaras Jaya Berhad ("the Company") and its subsidiaries ("the Group") are committed to achieving and maintaining high standards of integrity, accountability and ethical behaviour in conducting its businesses and operations.
- 1.2 Towards this end, the Company encourages all its employees and stakeholders to disclose any improper conduct in accordance with the procedures as provided under this policy and provide protection to employees and stakeholders who report such allegations.

### **Objective of the Policy**

2.1 The objective of this policy is to provide and facilitate a channel for any reporting individual ("Rl") to disclose genuine concerns about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse and to assist the Company on fraud detection.

#### Scope of the Policy

3.1 This policy shall cover misconduct and wrongdoings such as incidents of non-compliance of approved policies, fraudulent acts, bribe, corruption, misappropriations, conceal facts or information with intention to mislead, violation of laws and regulations, endangerment of employees or public health and safety and any irregularities that can impact the Company's reputation from such illegal and irresponsible acts. The examples are not exhaustive and include any act or omissions, which if proven, will constitute an act of misconduct under the Company's Code of Conduct.

#### Reporting in Good Faith

4.1 The Company expects all parties to act in good faith and have reasonable grounds when making a report. If allegations are made with malicious intent, the Company will take appropriate action against the parties concerned including legal action, where applicable.

#### **Protection from Retaliation and Reprisal**

- 5.1 The Company views retaliation or reprisal against the whistleblower seriously. The Company provides assurance to the whistleblower that he/she would be protected from retaliation or reprisal from his/her superior, manager or department head.
- 5.2 The Company assures that no disciplinary action can be taken against the whistleblower on condition that the information provided is accurate, factual and there is no element of malicious intent.



#### Confidentiality

- 6.1 All complaints reported to the Company are treated as confidential. Information will only be disclosed on a need-to-know basis and with the written permission from the Chairman of the Audit Committee.
- 6.2 The identity and particulars of the RI shall also be kept private and confidential unless it is required by law, court or authority.

#### **Procedures for Reporting**

The whistleblower should promptly report the suspected instance of misconduct or wrongdoing to the Company.

#### 7.1 For Internal Reporting

The whistleblower may notify his/her superior/manager immediately. If the inappropriate behavior involves his/her immediate superior or the whistleblower prefers to speak to a more senior member in the Company, the whistleblower may approach the Human Resources Team Member or an Executive Director.

#### 7.2 For External Reporting

The report must be in writing, submitted via post or email, to ensure that there is a clear understanding about the issues raised. The report should be sealed and marked "Private and Confidential" and addressed to the following Person In-Charge:

# Chairman of the Audit Committee or Head of Human Resource

Pintaras Jaya Berhad No. 8 Jalan Majistret U1/26 Hicom Glenmarie Industrial Park Selangor Darul Ehsan

Email: info@pintaras.com.my

#### **Procedure for Handling Reports**

- 8.1 The Person In-Charge who received the report must promptly act to investigate and resolve the issue. A proper record has to be maintained on the complaints, investigation and resolution.
- 8.2 All investigations shall be tabled to the Audit Committee that has the authority to ensure effective implementation of the whistleblowing policy. The Audit Committee shall update the Board of Directors on the status of investigation and recommend appropriate course of action to the Board for deliberation and approval.



- 8.3 If the case necessitates further action on the part of the Human Resource ("HR") department, a copy of the summary report will be provided to HR department.
- 8.4 The whistleblower shall be informed on the outcome of the investigation.

#### **Whistleblower Protection Act 2010**

9.1 In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the act shall prevail.