

SUPERLON HOLDINGS BERHAD
(Company No. 740412-X)

WHISTLEBLOWING POLICY AND PROCEDURE

1. Objective and Scope

Superlon Holdings Berhad (“the Company” or “SHB”) and its subsidiaries (collectively known as “the Group”) are committed to conduct the Group’s business with the highest level of corporate ethics and embed culture of transparency and accountability into day-to-day business operations.

This policy and procedure on whistleblowing (“Policy”) is to provide a formal avenue for all employees of the Group, business associates and external stakeholders to report any Concerns (defined herein) which may adversely impact the Group in accordance with the procedures as provided for under this Policy and to provide protection for the whistleblower(s) who reports such allegations (“Whistleblower”).

This Policy is designed to facilitate reporting mechanism of any genuine concerns, malpractices or criminal offences against any employee and director within the Group through the channels as detailed in Section 6.1 of this Policy. An employee of the Group and shall include contract staff, consultants, temporary employees and interns (“Employee”). Such concerns, malpractices or criminal offences include (but not limited to) the following:

- i. occupational / financial reporting fraud;
- ii. any form of corruption activities;
- iii. abuse of power;
- iv. serious conflict of interest;
- v. theft or embezzlement;
- vi. gross misuse of Group’s property; and
- vii. serious non-compliance with legal/ regulatory requirements, policies and procedures.

(collectively known as “Concerns”)

2. Confidentiality and Anonymity

- (a) Reasonable steps will be taken to maintain the confidentiality of the Whistleblower and report made by the Whistleblower, unless:-
 - the Whistleblower expressly agrees otherwise, and provides his agreement in writing; or
 - otherwise required by law.
- (b) The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties information regarding the Concerns or any part thereof, including the status or outcome of an investigation into it, except:
 - to those who are authorised under this Policy;
 - by lodging a report with an enforcement agency in accordance with any law;
 - if required by law; and
 - on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.
- (c) The Whistleblower shall not:
 - contact the suspected individual to determine facts or demand restitution; and
 - discuss the case, facts, suspicions, or allegations with anyone except to assist in the investigations.

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3. Reporting in Good Faith

Reporting in good faith requires an allegation of any Concerns, at a minimum level, to be based on factual, reasonable and probable grounds as well as made for the best interest of the Group instead of personal motive. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from malicious intent. In addition, any disclosure, which is found to be frivolous or vexatious, will not be entertained.

Any Whistleblower who has not acted in good faith shall not be eligible for any protection under this Policy. In addition, an employee within the Group will be subject to disciplinary action (which may include termination of employment) if his/her allegation is proven to have been made without good faith.

4. Protection

This Policy offers protection within limits of the law and to the extent reasonably practicable to the Whistleblower who submit the reports internally in good faith, even if the allegations have subsequently been proven to be unfounded or mistaken. In addition, a whistleblower will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the organisation, to the extent reasonably practicable, provided that the disclosure is made in good faith.

Retaliation against a whistleblower could be in the form of threats of physical harm or adverse employment action such as termination, compensation decreases, or poor work assignments. Any whistleblower who believes he / she is being retaliated against must contact the Head of Human Resources Department immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

5. Anonymous Allegations

Although anonymous allegations are not encouraged due to difficulty in verifying the facts or obtaining further evidence may affect the investigation process, the Company may consider investigating an anonymous allegation after having considered, amongst others, the following:

- i. the seriousness of the concern;
- ii. the credibility of the concern; and
- iii. the likelihood of confirming the concern from credible sources.

6. Procedures

6.1 Process for Disclosure

i. Scope

This section covers the reporting of any Concerns by a whistleblower in a timely manner.

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(Whistleblowing Policy and Procedure....cont'd)

ii. Reporting

A whistleblower who wishes to report any Concerns is to submit a report using the Whistleblower Report Form attached to this Policy as Appendix I together with any supporting evidence in the form of letter/ documents/ reports through either of the following channels as stated below:

- a) Email to whistleblowing@superlon.com.my. The email will be re-directed to:

No.	Designation
1	Chairman of Audit Committee
2	Chairman of SHB

- b) Submit in a sealed envelope (with the words “STRICTLY PRIVATE AND CONFIDENTIAL” as well as “TO BE OPENED BY THE ADDRESSEE ONLY”) and addressed to:

Chairman of Audit Committee / Chairman of SHB
Superlon Holdings Berhad
Lot 2567, Jalan Sungai Jati,
41200, Klang, Selangor D.E.
Malaysia.

If the whistleblower, either from an internal or external source makes a report through a third party, i.e., Senior Management who may be the Managing Director, Executive Director, Operations Director, Chief Financial Officer, General Manager or any other employee, it is the responsibility of the third party to escalate the report to the right channel as mentioned in (a) or (b) above.

iii. Handling of a reported allegation

All reports of misconduct, findings of investigations and monitoring and corrective actions shall be centralised and logged in a log administered and monitored by the Board of Directors. The Board shall be informed of any new reports of misconduct and may request to review the log at any time.

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

6.2 Investigator

The Internal Auditor shall be the named Investigator unless the Chairman of Audit Committee assigns / appoints another Investigator. An 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 actions taken or to be taken as a result of the investigations, to the Chairman of Audit Committee.

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(Whistleblowing Policy and Procedure....cont'd)

6.3 Inquiries

Preliminary inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

If an investigation leads the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group's Code of Conduct, the results of the investigation shall be reported to the above-mentioned parties accordingly for the next course of action by the relevant party. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

7. Policy Matters

This Policy is published on the Company's website and made available for all internal and external stakeholders.

8. Monitoring and Periodic Review of Policy

The Group is to diligently monitor whistleblowing policy and procedures disclosed herein to ensure that they meet the objectives of relevant legislations and remain effective for the Group; and, if necessary, implement changes subject to the approval of the Board of Directors.

This policy will be reviewed periodically and may be amended as it deems appropriate to ensure its relevance and effectiveness.

This Whistleblowing Policy and Procedure was last updated on 27th May 2020.

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APPENDIX I

**SUPERLON HOLDINGS BERHAD
WHISTLEBLOWER REPORT FORM**

Please provide the following details for any concerns, malpractices or criminal offences that may adversely impact the Group. Please note that you will be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistleblowing Policy and Procedure.

Reporter's Contact Information			
Name			
I/C No. / Passport No. / Staff No.			
Correspondence Address			
Telephone No.	Home		
	Office		
	Mobile		
E-mail Address			
Designation / Occupation			
Division / Section / Unit / Branch			
Preferred method of communication	<input type="checkbox"/> Mail	<input type="checkbox"/> E-mail	<input type="checkbox"/> Telephone / SMS

Suspect's Information			
Individual 1			
Name of employee			
Designation			
Division / Section / Unit / Branch			
Contact Number		Email Address	
How do you know this employee?			
Individual 2			
Name of employee			
Designation			
Division / Section / Unit / Branch			
Contact Number		Email Address	
How do you know this employee?			
Individual 3			
Name of employee			
Designation			
Division / Section / Unit / Branch			
Contact Number		Email Address	
How do you know this employee?			

APPENDIX I

Details of the misconduct		
<p>COMPLAINT: Briefly describe the misconduct / improper activity and how do you know about it by specifying what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</p>		
<p>What kind of misconduct / improper activity had occurred?</p>		
<p>Who had committed the misconduct / improper activity?</p>		
<p>When did the misconduct / improper activity occur? And since when had you noticed it?</p>		
<p>Where did the misconduct / improper activity happen?</p>		
<p>Is there any evidence that you could provide to us?</p>		
<p>Do you have any other details or information which could assist us in the investigation? Please attach supporting evidence, if any.</p>		
<p>If money is involved, can you estimate the amount of money involved?</p>	<p>Yes</p>	<p>No</p>
<p>If YES, please indicate the estimated amount of money involved (cross X where applicable):</p> <p>Less than RM5,000 <input type="checkbox"/></p> <p>RM5,000 to RM50,000 <input type="checkbox"/></p> <p>RM50,001 to RM100,000 <input type="checkbox"/></p> <p>More than RM100,000 <input type="checkbox"/></p>		
<p>Have you lodged a complaint on this matter to another person / department / authority before?</p>	<p>Yes</p>	<p>No</p>
<p>If YES, please indicate the person / department / authority that the report was lodged (cross X where applicable and attach copy of the report made):</p> <p>Police <input type="checkbox"/></p> <p>Malaysian Anti-Corruption Commission <input type="checkbox"/></p> <p>Others, please indicate: <input type="checkbox"/></p>		
<p>Date when the report was made</p>		
<p>Status of report made</p>		

APPENDIX I

Declaration	
I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.	
I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.	
Signature	
Name	
Date	

For office use only	
Record No.	
Receipt Information	Person receiving this report:
	Date received:
	Acknowledgement of receipt sent on:
Investigation required (YES / No)? (If No please state the reason)	
Investigation Done By:	
Investigation Result:	
Action Taken / Conclusion:	
Reported to the Board on:	
Signed off by:	