

WHISTLE-BLOWING POLICY

1. POLICY STATEMENT

Ancom Berhad (“Ancom” or “Company”) is committed to upholding values and highest standard of work ethics for all its Directors, managers and employees in line with good corporate governance and business integrity practices.

The Company has adopted this Whistleblowing Policy (“Policy”) to provide an avenue for employees of the Company and its subsidiary companies (“Group”) and members of the public to raise genuine concerns of any wrongdoing or improper conduct involving the Group and/or its Directors, managers or employees.

2. OBJECTIVE

The objective of this Policy is to encourage reporting of any suspected fraud, corruption, misconduct or inappropriate behaviour of anyone within the Group. The Policy will provide an avenue for all Group employees and agents, vendors, contractors, suppliers, consultants, customers and members of Ancom to raise concerns about any improper conduct without fear of retaliation. It will also offer protection for those who report improper conduct in order to strengthen the Group’s accountability and transparency in its business affairs.

3. TYPE OF IMPROPER CONDUCT

Under the statutory framework, “improper conduct” is taken to mean any conduct which if proved, constitutes a disciplinary offence or a criminal offence. The following list, which is not exhaustive, shall constitute “Reportable Misconduct” under this Policy:

- a) Fraud, misappropriation of funds or assets;
- b) Bribery, corruption or blackmail;
- c) Violation of the Company’s code of conduct, procedures or policies;
- d) Improper or unethical conduct or behaviour;
- e) Conflict of interest;
- f) Theft or embezzlement of funds or assets;
- g) Abuse of power or position;
- h) Breach of confidentiality;
- i) Criminal breach of trust;
- j) Failure to comply with any legal obligations or breach of internal control;
- k) Danger to health and safety of any employee of Ancom or any other individual; and
- l) Sexual harassment.

4. PROTECTION FOR WHISTLEBLOWERS

Ancom is committed to ensuring confidentiality in respect of all matters raised under this Policy.

a) Confidentiality

The confidentiality of the identity, occupation, residential address, work address or whereabouts of the whistleblower, and the information disclosed by the whistleblower will be protected. Ancom assures that all reports will be treated with the strictest confidence and will be promptly investigated.

b) Assurance against retaliation and immunity from disciplinary action

This Policy provides assurance that the whistleblower, if an employee of the Group, shall be protected against retaliation and enjoy immunity from any civil or criminal liability or any liability arising by way of administrative process, including disciplinary action from the whistleblower's immediate supervisor or department/division head or any other person exercising power or authority over the whistleblower in his/her employment.

5. REPORTING WITH REASONABLE BELIEF

Ancom expects its employees and stakeholders to report genuine concerns about unethical behaviour, malpractice, illegal acts or failure to comply with regulatory requirements without fear of reprisal. However, a person should make disclosure based on reasonable belief that any person has engaged, is engaging or is preparing to engage in improper conduct, provided that such disclosure is not specifically prohibited by any written law.

There are, however, instances where whistleblower protection will be revoked, for example, in such circumstances as the whistleblower himself has participated in the improper conduct disclosed, or the disclosure made is frivolous or vexatious or, the whistleblower willfully made disclosure that he knew or believed to be false.

Malicious and false allegations reported by employees will be viewed seriously and treated as gross misconduct. If proven, it may lead to dismissal. The Company will also take appropriate action against employees and/or stakeholders concerned including legal action, where appropriate.

If, however, a report is made in good faith, and a subsequent investigation proves it to be untrue, the whistleblower will still be eligible for protection under this Policy.

6. WHISTLEBLOWING CHANNEL

Reports are to be channelled through the Company's website at www.ancom.com.my using the form provided. The report must be in writing and submitted via email or post (**marked Strictly Confidential**) to ensure that there is clear understanding about the issues raised. Reports will be directed to the Head of the Integrity Unit and copied to the Company Secretary and Chairman of the Audit Committee of the Company. The whistleblower shall disclose his/her personal identity in the form attached, and anonymous whistleblowing reports will be considered only at the discretion of the Company. The Company may, however, consider investigating an anonymous allegation after having assessed the following:

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- a) the seriousness of the concern;
- b) the credibility of the concern; and
- c) the likelihood of confirming the concern from credible sources.

Channels of reporting are as follows:

Name	Email	Telephone	Address
Head of Integrity Unit	cio.integrity@ancom.com.my	603-7495 5080	C/O Ancom Berhad No 2A, Jalan 13/2, Seksyen 13, 46200 Petaling Jaya, Selangor, MALAYSIA
Company Secretary	choo-se-eng@ancom.com.my	603-7495 5098	C/O Ancom Berhad No 2A, Jalan 13/2, Seksyen 13, 46200 Petaling Jaya, Selangor, MALAYSIA
Chairman of the Audit Committee	edmondcheah@gmail.com	6012- 330 5499	C/O Ancom Berhad No 2A, Jalan 13/2, Seksyen 13, 46200 Petaling Jaya, Selangor, MALAYSIA

Upon receiving a report, the Head of the Integrity Unit must act promptly to investigate and resolve the issue.

The whistleblower shall be informed of the progress and outcome of the investigation.

7. AMENDMENT OF POLICY

This Policy cannot be amended without approval from the Company's Board. It will be reviewed from time to time to ensure that it remains effective and meets best practices and the needs of Ancom.

In the event that there are discrepancies between this Policy and the Whistleblower Protection Act, 2010 ("Act"), the Act shall prevail.

The Whistleblowing Policy was reviewed by the Board on 29 July 2020.

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(Incorporated in Malaysia)

WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or breach or suspected breach of law or regulation that may adversely impact the Group. Please note that you may be called upon to assist in the investigation, if required.

** Compulsory field*

REPORTER'S CONTACT INFORMATION	
Name *	
Designation	
Department	
Contact No.	
Email Address *	
SUSPECT'S INFORMATION	
Name *	
Designation	
Department *	
Contact No.	
Email Address	
WITNESSES' INFORMATION (if applicable)	
Name	
Designation	
Department	
Contact No.	
Email Address	
COMPLAINT: <i>Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</i>	
1. What misconduct / improper activity occurred?*	
2. Who committed the misconduct / improper activity?*	

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3. When did it happen and when did you notice it?*

4. Where did it happen?*

5. Is there any evidence that you could provide us?

6. Are there any other parties involved other than the suspect stated above?

7. Do you have any other details or information which would assist us in the investigation?

8. Any other comments?

Date:

Signature: