

**SCANWOLF CORPORATION BERHAD**  
**200601021156 (740909-T)**

**WHISTLEBLOWING POLICY**

**1. INTRODUCTION**

Scanwolf Corporation Berhad and its subsidiaries (“**the Group**”) is committed to promoting a culture of honesty, ethical behavior and good corporate governance within the Group where the Directors, employees or any persons are encouraged to raise genuine concerns regarding suspected fraud, illegal conduct, wrongdoing and other malpractices at the earliest opportunity, and in an appropriate way.

The Whistleblowing Policy (“**the Policy**”) is aimed to serve the following purposes:

- To encourage and develop a culture of accountability and integrity within the group of companies which in turn shall enhance the Group’s credibility to all stakeholders;
- To provide a mechanism for employees, Directors or any persons to report instances of unethical behavior, actual or suspected fraud or dishonesty or misconduct;
- To provide reassurance that whistleblowers will be protected from detrimental action or prejudicial treatment for the disclosure of concerns in good faith; and
- To protect a whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such person’s confidentiality.

**2. SCOPE**

This Policy is applied to all matters involving the Group’s employees and other stakeholders within relevant relationship or engagement with the Group, where relevant. In general, any improper conduct (misconduct or criminal offence) includes, but is not limited to, the following:-

- suspected criminal offence;
- breach of the Company’s policies and procedures and/or code of conduct;
- impropriety, corruption, acts of fraud, theft and/misuse of the Company’s properties/resources;
- negligence/malpractice;
- abuse of power or authority;

- serious conflicts of interest without disclosure;
- fraud against investors, or the making of fraudulent statements to Bursa Malaysia Securities Berhad, members of the investing public and regulatory authorities;
- acts to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external accountant or auditor in connection with the preparation, examination, audit or review of any financial statements or records of the Group;
- sexual harassment;
- bribery, blackmail and miscarriage of justice;
- behavior involving danger to the health or safety of any individual;
- attempts to suppress or conceal any information relating to any of the above; and
- non-compliance or inappropriate business practice.

### **3. CONFIDENTIALITY AND PROTECTION**

For each whistleblowing exercise, the identity of the whistleblower will be accorded with protection of strict confidentiality unless otherwise required by law or for purposes of any proceedings by or against the Company.

The said protection will be granted by the Company only when the whistleblower satisfies all the following conditions:-

- Disclosure is done in good faith and was not made for personal gain or interest, i.e. which may be established either directly or indirectly;
- The whistleblower has reasonable belief that the information and any allegations disclosed are true; and
- No means of communication or disclosure was undertaken by the whistleblower to any other party not relevant to the disclosure.

Furthermore, the whistleblower will be protected from adverse employment action (i.e. penalty, dismissal, demotion or suspension) within the Group as a consequence of his or her disclosure.

Likewise, the Group will not tolerate if it is noted that the whistleblower knowingly or recklessly makes false and malicious allegation in bad faith to discredit, humiliate or damage the reputation of another party. Should such instances occur, the parties responsible may be subjected to the appropriate disciplinary action, including but not limited to legal action, where applicable.

#### 4. REPORTING PROCEDURE

##### 4.1 For employees to make report

- 4.1.1 Any employee who believe that misconduct exist in the workplace, the employee should report the concern to the Head of Department or General Manager of Division.
- 4.1.2 Where the concern is deemed not appropriate to be reported to the General Manager or Head of Department, then it should be brought to the attention of the Executive Director.
- 4.1.3 If the concern cannot be discussed with any of the above, the employee may report to the Chairman of the Audit Committee.
- 4.1.4 The report must be in writing, submit via post or email.
- 4.1.5 The report can be communicated in writing via mail or email addressed to the following :

Mr Ong Sing Guan  
Chairman of Audit Committee  
No.19, 19A, 19B & 19C,  
Jalan Pusat Perniagaan Falim 5,  
Pusat Perniagaan Falim  
30200 Ipoh, Perak.

Email: singguan-audit@scanwolf.com

- 4.1.6 For hardcopy letters, the report should be sealed in an envelope if sent via post with **“Strictly Private & Confidential”** indicated.

##### 4.2 For Stakeholders to make report

- 4.2.1 Stakeholders who suspected any misconduct are encouraged to raise the concern to the Chairman of the Company by communicating in writing via mail or email addressed to the following:

Mr John Lau Tiang Hua  
Chairman  
Level 5 Menara BHL  
51 Jalan Sultan Ahmad Shah  
10050 Penang

Email: john.lau@my.gt.com

- 4.2.2 The report must be in writing, submit via post or email.
- 4.2.3 In cases where reporting to the Chairman of the Company is a concern, then report should be made to the Chairman of the Audit Committee, the details as mentioned in 4.1.5 above.
- 4.2.4 For hardcopy letters, the report should be sealed in an envelope if sent via post with **“Strictly Private & Confidential”** indicated.

## **5. HANDLING OF REPORTED CASES**

- 5.1 The Chairman of the Company or the Chairman of the Audit Committee will assess each reported case.
- 5.2 All reports received anonymously will be treated with confidentiality. Following the receipt of reports, an independent investigation team will be set up by the Chairman of the Audit Committee / Chairman of the Company in order to initiate an investigation exercise on the major concerns within a reasonable timeframe.
- 5.3 The amount of contact between the whistleblower and the Chairman of the Audit Committee / Chairman of the Company will be determined by the nature and clarity of the matter reported. Further information may be sought from the whistleblower during the course of the investigation.
- 5.4 Once the investigation is completed, observations and findings on the matter shall be reported to the Audit Committee for their deliberation. Audit Committee shall provide the Board of Directors the advice on measures/corrective action to be taken (depending on the person involved in the reported case) and monitor the execution.

## **6. REVIEW OF POLICY**

This Policy shall be reviewed periodically in accordance with the needs of the Group. The review should address the overall effectiveness of the Policy. The Group reserves the rights to amend and modify this Policy and produce in whole or in part, at any time without assigning any reason whatsoever. Any changes will be reported to the Audit Committee and the Board of Directors for approval.