

ICONIC WORLDWIDE BERHAD
(196901000067) (8386-P)

Whistle Blowing Policy

The Group believes in adopting high standards of integrity, honesty and accountability in the conduct of its businesses and operations. The Group aspires to conduct its business affairs in the most ethical, responsible and transparent manner possible.

The Group encourages all employees and the public to disclose any improper conduct in accordance with procedures provided under the Whistle Blowing policy.

The Whistle Blowing Policy which is provided below is also published on the Company's website at www.iconic.com.my

Objective

The objective of this policy is to position ICONIC and all its subsidiaries (hereinafter referred to as "the ICONIC Group") in providing an avenue for its employees and/or stakeholders to raise concerns in confidence, disclose any fraud, corruption/bribery/blackmail, theft or embezzlement, misuse of Company's property abuse of power, criminal offences, failure to comply with legal or regulatory obligation, miscarriage of justice or endangerment of an individual's health and safety of which they become aware, and to ensure that the employee and/or stakeholder who reports allegations of such concerns will be protected from possible reprisals or retaliations if he/she has a reasonable belief that the disclosure was made in good faith.

Scope of Policy

This policy is designed to facilitate employees and stakeholders a specific means to disclose or report through established channels, concerns on any improper conduct (misconduct or criminal offence).

The above list is not exhaustive and includes any act or omissions, which, if proven, will constitute an act of misconduct under the Company's Codes of Conduct and Business Ethics or any criminal offence under relevant legislations in force.

Only genuine concerns should be reported under the Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and report is not made for personal gain, malicious and false allegations by the whistle blower will be view seriously and treated as a gross misconduct and if proven may lead to dismissal or termination of the whistle blower who abuses this policy.

Whistleblower refers to any individual/person who disclose/report any suspected and/or known instances of improper activities as stated in Objective para above.

Policy Statement

It is the policy of the ICONIC Group:

- (i) That the ICONIC Group is committed to achieving and maintaining high standards with regards to behaviour at work.
- (ii) That all ICONIC Group employees and stakeholders are encouraged to report promptly genuine concerns about any grievances within the scope of the Whistle Blowing policy without fear of reprisal should they act in good faith when reporting such concern. Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.
- (iii) That ICONIC Group views any harassments or retaliations in any forms or manner against genuine whistle blowers seriously and will treat such actions as gross misconduct, which if proven, may lead to dismissal or termination of the person/ parties harassing or retaliating in any form or manner against genuine whistle blower.
- (iv) That ICONIC Group assures Whistleblower who raises issues of concern that he/she will be protected from any adverse impact on their employment or relationship with the ICONIC Group as a result of his/her reporting, provided the report is made in good faith and without malice.

Procedures

Employees who have become aware of actual or potential acts of bribery and corruption affecting ICONIC should raise their concern by making a report through one of the IWB Group's whistleblowing channels:

- Send an email to the Whistleblowing Coordinator at admin.worldwide@iconic.com.my
- Send an email to the Chairman of the Audit Committee at acchairman@iconic.com.my
- Post the report to the Whistleblowing Coordinator at the following address:

ICONIC WORLDWIDE BERHAD

No 1-2, Jalan Icon City, Icon City,
14000 Bukit Mertajam, Penang

The report must provide full details of the following:

- a) Details of the Complainant
- b) Type of improper activity/conduct
- c) Details of suspected personnel involved
- d) Information on incident (Date, Time and Place of incident)
- e) Any document, information or physical evidences relating to the complaint.

All whistleblowing reports will be treated confidentially and kept protected against any unauthorised use and access, except where it is permitted under applicable laws. All reports must be legitimate and be made in good faith. Anyone who makes a malicious, scandalous or vexatious report, and particularly if they persist with such untrue allegations, will be subjected to disciplinary action.

Action

- (a) All reports will be investigated promptly by the person receiving the report who should promptly report to the management, **if appropriate**. If required, he/she can obtain assistance from other resources within the ICONIC Group. The progress of investigation will be reported to the Audited Committee no later than at the next scheduled meeting.
- (b) Reports received anonymously will be treated as confidential. However, Whistleblower will be advised that maintaining anonymity may hinder an investigation. Notwithstanding this, anonymity will be maintained as long as it is permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
- (c) If the Whistleblower report is made to the Chairman of Audit Committee at acchairman@iconic.com.my, the Chairman in consultation with other members, shall decide whether the allegation has merit and could be substantiated.
- (d) If an investigation is to be carried out, the Chairman of Audit Committee may appoint the internal auditor of the Company or an independent party to carry out the investigation.
- (e) The Whistleblower shall give his /her full cooperation during the course of the investigation, if required.
- (f) Upon completion of investigating any Whistleblower report, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
- (g) Where possible, steps will be taken to prevent similar situation from arising again.
- (h) The Whistleblower will be informed of the outcome of the investigation.
- (i) All information, documents, records and reports relating to the investigation of the Whistleblower report shall be kept securely by the Whistleblowing Coordinator to ensure its confidentiality.