UNIMECH GROUP BERHAD
Company No.: 199601035227 (407580-X)
(Incorporated in Malaysia)

WHISTLE BLOWING POLICY

OBJECTIVES

The Board of Directors ("the Board") of UNIMECH Group Berhad ("the Company") is committed to achieving and maintaining the highest standard of work ethics in the conduct of business in line with the code of conduct & ethics and good corporate governance practices. The Company and its subsidiaries ("the Group") encourage its employees to report suspected and/or known misconduct, wrongdoings, corruption and instances of fraud, waste, and/or abuse involving the resources of the Group.

This policy is to provide an avenue for all employees of the Group and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

The policy is designed to support to the following:

a) Be committed to the Company's business ethics of Honesty, Integrity and Transparency;
b) To provide a transparent and confidential process for all parties to give information on non-compliances to the Code of Ethics and Conduct, or any misconduct regardless of his or her position, to an independent party to investigate the allegations and take the appropriate actions; and
c) To uphold the moral duty being a Company by protecting the interest of all its stakeholders.

DEFINITION OF REPORTED MISCONDUCT

An improper conduct is any act or omission, which if proven, will constitute an act of misconduct pursuant to the Group's Code of Conduct and Ethics and/or a criminal offence under the relevant law in force and may be divided into the following categories:

1. General Misconduct

a) use of vulgar or abusive language/behaviour against fellow colleagues or a superior or any person having business with the Company;
b) intentional insubordination or disobedience whether alone or on combination with others to any lawful and reasonable instructions of a superior or those acting under the instruction of a superior, which the employee is required to follow;
c) intentional slow-down of work and/or influence others to do so or conduct that is disrupting other colleagues;
d) threatening or use of violence and/or oppression against another employee or persons having dealings with the Company;
e) use of Company's property or facilities for purposes of committing or attempting or preparing to commit a misconduct; and
f) sexual harassment by or any person(s) employed is strictly prohibited. The provisions contained in the "Code of Practice on the Prevention and Eradication of Sexual Harassment in the Workplace" issued by the Malaysian Ministry of Human Resource are to be observed.

2. Unlawful/ Illegal Conduct/Intention

a) Fraudulent case;
b) Dishonesty, corruption, bribery, blackmail;
c) Failure to comply with any legal/regulatory obligation;
d) Breach of law, rules and regulation; and
e) Cheating, theft and corruption.

3. Unprocedural Conduct/Act

Actions/conduct which violates clearly communicated procedures that governs operations of the Company where such procedures are important for good governance and breaching may expose the Company to risk of loss or actual loss.

4. Conflict of Interest

a) All employees are not allowed to knowingly place himself/herself in a position conflicting with the interest/statutory duties in the Company and shall at all times, avoid being caught in situation of conflict of interest;
b) Employees have to ensure that their personal financial circumstances and transactions do not jeopardise their independent judgement or adversely affect their job performance; and
c) Employees must not have any direct or indirect involvement in other employment (remunerated or otherwise) except otherwise agreed by the management.

5. Unethical Conduct

a) Cause damage to the environment;
b) Religious or racial or sexual discrimination;
c) Serious non-professional or non-ethical behavior; and
d) Cause danger to the health and safety of any individual.

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 Code of Conduct and Ethics or any criminal offence under relevant legislations in force.

CONFIDENTIALITY AND ANONYMITY

All whistle blowing reports are treated as confidential and/or anonymous and not to reveal the blower's identity, if so wish. However, such consultation will not take place in the event the disclosure of identity is required by law. The whistle-blower is to be given an assurance that his/her identity will be only known by a few top management on a need to know basis and the outcome of the investigation will be fed back to the whistle-blower. This is to encourage and give confidence to the whistle-blower that the complaint will be investigated.

All whistle-blowing reports have to be made in good faith with reasonable belief that the information and allegation is true and not frivolously/maliciously and not for personal gain; otherwise, disciplinary action may be taken against an employee whistle-blower.

PROTECTION TO WHISTLE-BLOWER

This policy provides assurance that the whistle-blower, if an employee of the Company, shall be protected against reprisals or retaliation, and immunity from disciplinary action from the whistle-blower's immediate supervisor or department/division head or any other person exercising power or authority over the whistle-blower in his/her employment, provided that:

a) only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistle-blower does not provide false or misleading information knowingly, negligently or recklessly in the report;
b) the disclosure is not made with malicious intent or ill will;
c) the disclosure is not frivolous or vexatious; and
d) the report is not made for personal gain or agenda.

We trust that every whistle-blower must conduct themselves with high integrity and responsibility. To establish a sound relationship of trust, individuals who make disclosures are encouraged to identify themselves and their contact (phone number/email). This is especially so when more detailed information is

required. Whenever necessary, the whistle-blower may be required to stand as a witness for the Company for the appropriate disciplinary action to be effective.

All information received will be treated with strictest confidentiality.

REPORTING PROCEDURES

1. For Employees to Make Reports

a) Any concern should be reported to the immediate supervisor. However, if it is not possible or appropriate to do so, the concern should then be reported to the Group General Manager.
b) Any concern that is deemed not appropriate to be reported to the immediate superior should be raised to the attention of the Chief Executive Officer (CEO).
c) Upon receipt of the concern, the Group General Manager or the CEO (depending on who is the recipient of the reporting) shall set up an investigating team to conduct investigation on the issue/concern raised.
d) The progress of the investigation shall be reported to the Group General Manager or the CEO.
e) Upon completion of the investigation, the Investigators shall submit their full report together with recommendation to the Group General Manager or the CEO.
f) Actions mandated shall be carried out accordingly.
g) If the whistleblower is not satisfied with the way the concern/matter is dealt with, he/she can escalate the report to the Audit Committee Chairman. The Audit Committee will deliberate the matter reported and decide on the appropriate action.

2. For Stakeholders to Make Reports

Stakeholders, who have suspected fraud, misconduct or any integrity concerns, are encouraged to fill up a Whistle Blowing Report Form as attached and send to:

Attention : Mr Teh Eng Aun
Designation : Audit Committee Chairman
Address : Unimech Group Berhad
Suite S-21-H, 21st Floor
Menara Northam
55 Jln Sultan Ahmad Shah
10050 Penang

Or

Attention : Dato' Seri Abdul Rafique Bin Abdul Karim / Mr Khairilanuar Bin Tun Abdul Rahman
Designation : Audit Committee Member
Address Unimech Group Berhad
Suite S-21-H, 21st Floor
Menara Northam
55 Jln Sultan Ahmad Shah
10050 Penang

END.

WHISTLE BLOWING REPORT FORM

A. Nature of Misconduct
(Kindly describe the incident, specify date, time and venue and who is involved).

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B. Contact

Name of Whistle-Blower :_____
(Optional, but we encourage to be transparent)

Contact (for further details):

Tel No : _____

Email Address : _____

Date : _____

This Whistle Blowing Policy was reviewed by the Board on 24 November 2021.