

WHISTLEBLOWING POLICY AND PROCEDURES



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1.0 OBJECTIVE

The objective of this Policy is to provide a process for employees or members of the public to raise genuine concerns of improper conduct or unethical behaviour, actual or suspected fraud and/or abuse in accordance with procedures as provided for under this Policy and to provide protection for those who report such allegations.

2.0 SCOPE

- 2.1 This Policy applies to all employees within the CJ Century Group of Companies. This Policy covers all reports made against any employee that has committed any improper conduct. A report of improper conduct may be made by any employee or any external party that has knowledge of an improper conducted by an employee.
- 2.2 This Policy is not to invalidate the Grievance Procedure and/or Disciplinary Procedure but to provide alternative means for employees and external parties to raise a concern outside the normal reporting channels. This Policy will not apply to personal grievances concerning an individual's terms and conditions of employment, or aspects of working relationship, complaints of bullying or harassment or disciplinary matters. Such complaints should be dealt under the existing Grievance Procedures.

3.0 OVERSIGHT AND OWNERSHIP OF POLICY

- 3.1 The Whistleblowing Committee of CJ Century has overall responsibility for this Policy and shall oversee the implementation of this Policy.
 - 3.1.1 The Whistleblowing Committee shall be appointed by the Company, which fulfils the following requirements;
 - 3.1.1.1 The Committee must comprise the Managing Director, Executive Director, Head of Human Resources and Administration, and/or Chairperson of Audit Committee; and
 - 3.1.1.2 The quorum for each meeting shall consist at least two (2) members.
 - 3.1.2 The members of the Committee shall elect a Chairperson from among the members.
 - 3.1.3 In the event when the Committee receives a sealed envelope, a meeting shall be called upon in order to open the envelope in front of the Committee members. This is to ensure transparency in revealing the confidential report by the Whistleblower.
 - 3.1.4 The Committee may from time to time and if deemed appropriate, consider and approve and/or recommend relevant matters via a Circular Resolution or Report in writing, in lieu of formally convening a meeting. The Circular Resolution or Report shall be as valid and

effectual as if it has been passed by a meeting of the Committee duly convened.

- 3.1.5 Any other appropriate officers may be invited to attend where their presence is considered appropriate as determined by the Committee Chairperson.
- 3.2 The owner of this document is the Human Resources and Administration Department who shall be responsible for incorporating any amendments and updates into this document, obtaining the approval of the Whistleblowing Committee for those amendments and updates and distributing the same to the relevant parties.
- 3.3 The use and effectiveness of this Policy shall be regularly monitored and reviewed by the Human Resources and Administration Department.
- 3.4 CJ Century reserves the right to amend the Policy from time to time to maintain compliance with applicable laws and regulations or accommodate organizational changes within CJ Century.

4.0 DEFINITIONS

- 4.1 “Company” means CJ Century Logistics Holdings Berhad and /or any of its subsidiaries.
- 4.2 “Improper conduct” generally means any conduct which constitutes a criminal offence or any conduct that constitutes a wrongdoing or malpractice and may include any of the examples stated in this Policy.
- 4.3 “Whistleblower” means a person that makes a report of Improper Conduct under this Policy.

5.0 WHISTLEBLOWING

- 5.1 Whistleblowing is an act of disclosing information of corruption and malpractices within an organisation or a workplace.
- 5.2 The following are examples of issues that can be reported through this Policy:
 - 5.2.1 Fraud : Dishonest activity (with intentional deception or wilful misrepresentation) causing actual or potential financial loss to any person or entity.
 - 5.2.2 Corruption : Dishonest activity in which a director, employee or contractor of the Company acts contrary to the interest of the Company and abuses his/her position of trust in order to achieve personal gain or advantage for himself/ herself or for another person or entity.
 - 5.2.3 Conflict of Interest : A situation that has the potential to undermine the impartiality of a person or Company due to the possibility of a clash of person or Company’s self-interest and professional interest or public interest.
 - 5.2.4 Bribery : An act of taking or receiving something with the intention of influencing the recipient in some way favourable to the party providing the bribe.

- 5.2.5 Breach of policies : Violation of the Company's rules and regulations.
 - 5.2.6 Theft : Where a person intentionally and fraudulently takes personal property of another without permission or consent and with the intent to convert it to the taker's use.
 - 5.2.7 Participating in unauthorised financial transactions.
 - 5.2.8 Breach of fiduciary relationship.
 - 5.2.9 Spreading malicious rumours about the Company
 - 5.2.10 Gross negligence and neglect of duty.
 - 5.2.11 Unauthorised disclosure of confidential information, including commercial or manufacturing secrets, calculations or designs.
 - 5.2.12 All forms of harassment including but not confined to unwelcomed verbal or physical advances and sexually, racially or otherwise derogatory or discriminatory statements or remarks.
 - 5.2.13 Commission of any subversive act.
 - 5.2.14 Commission of any act that brings disrepute, embarrassment or affects the legitimate interest of the Company or ruins the image of the Company.
 - 5.2.15 Habitual breach of any Company's order or any law applicable to the establishment of rules made thereunder.
 - 5.2.16 Conduct which is likely to cause injury or endanger the life or safety of another person within the Company's premise.
 - 5.2.17 Misrepresentation of the Company to others.
- 5.3 The above are not exhaustive and if in doubt, employees are encouraged to check with the Head of Human Resources and Administration Department so as to allow employees to clarify if an issue falls under this Policy even on an anonymous basis.

6.0 OTHER PROCEDURES

- 6.1 Grievance procedures – Typically, whistleblowing does not affect the complainant personally. They are therefore different from a normal grievance or complaint in which the complainant is personally affected. If you are the victim of unfair treatment, the complaint shall be channelled through the grievance procedure so that the appropriate action may be taken.
- 6.2 Sensitive matters – Some sensitive matters may have different procedures for reporting any improper conduct or wrongdoing such as sexual harassment. In circumstances where there are specific procedures prescribed, those specific procedures shall apply.

7.0 ROLE OF WHISTLEBLOWER

- 7.1 The Whistleblower's role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action. Whistleblowers should not conduct any investigative activities, nor do they have a right to participate in any investigative activities.
- 7.2 Wherever possible, concerns should be raised and dealt with through the normal reporting lines and procedures in the Company. However, where it is believed that the malpractice cannot be resolved through the normal reporting lines and procedures or implicates very senior levels of management within the Company, and the employee's own employment may be jeopardised by raising the concern, then the issue can be raised through the channel provided by this Policy.
- 7.3 A Whistleblower must act in good faith and have reasonable grounds for believing that the information shared in the report indicates that a violation has occurred or suspected to have occurred.

8.0 CONFIDENTIALITY

- 8.1 The Company will take all reasonable steps to protect the identity of the Whistleblower. Maintaining confidentiality is crucial in preventing reprisals against a Whistleblower. Specific request by the Whistleblower not to reveal his identity must be upheld. While making a report, the Whistleblower can request that the Company does not disclose his identity to any staff from the Company.
- 8.2 Any person who receives information from the handling or investigating of a report is not to disclose information in relation to the case and especially the identity of the Whistleblower except in circumstances such as:
 - 8.2.1 When the Whistleblower agrees to the disclosures in writing.
 - 8.2.2 When making a report or recommendation for remedial actions where a former Whistleblower suffers any form of reprisals for being a Whistleblower.
 - 8.2.3 When required by law.

9.0 PROTECTION TO WHISTLEBLOWER AGAINST REPRISAL

- 9.1 Informant will receive Whistleblower protection as per the Whistleblower Protection Act 2010.
- 9.2 No person entitled to protection shall be subjected to reprisal, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he is the subject of any form of reprisal for such participation should immediately report the same as a violation of and in accordance with this Policy. Any individual

within the Company who reprimands against another individual who has reported a violation in good faith or who, in good faith has cooperated in the investigation of a violation is subject to discipline, including termination of employment.

- 9.3 The identity of Whistleblowers shall be kept confidential to the extent possible and permitted under law. Whistleblowers are cautioned that their identities may become known for reasons outside the control of the Company (e.g. during investigations carried out by Investigators).
- 9.4 Any other employee assisting in the said investigation shall also be protected to the same extent as the Whistleblower.

10.0 WHEN PROTECTION MAY NOT BE AVAILABLE

- 10.1 The Employee may not avail him/herself to the protection against reprisal mentioned in 9.0 above in the following circumstances:
 - 10.1.1 If the report of Improper Conduct is not made in good faith; or
 - 10.1.2 If the employee him/herself has participated in the Improper Conduct reported; or
 - 10.1.3 The report of Improper Conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
 - 10.1.4 The employee breaches his/her obligations of confidentiality under this Policy.
- 10.2 Any employee who has participated in an Improper Conduct may be subject to disciplinary action. However, in certain circumstances, the Committee may in its discretion, on a case by case basis decide to grant amnesty to the Employee or consider leniency for the Employee.

However, please note that the Company has no power to provide any immunity from criminal prosecution. The Company also does not have any power to grant any protection from reprisal to a Whistleblower who is not an employee.

11.0 DISQUALIFICATION

- 11.1 While it will be ensured that genuine Whistleblowers are accorded complete protection from any kind of unfair treatment, any abuse of this protection can warrant disciplinary action.
- 11.2 Protection under this Policy will not mean protection from disciplinary action arising out of false, frivolous, baseless or bogus allegations made by a Whistleblower knowingly.

12.0 LODGING A REPORT OF IMPROPER CONDUCT

- 12.1 Although employees can continue to use the existing communication conduits to raise appropriate

matters with their supervisors or the respective channel, under this Policy, employees can choose to lodge reports to the Company. If an employee has information or proof of any cases of corruption or malpractice, they may bring the case to the attention of the Whistleblowing Committee at whistleblowing@cjcentury.com

- 12.2 An employee shall make a confidential report of Improper Conduct in writing (refer Appendix 1, Form for Reporting of Improper Conduct). The employee must provide full details of the Improper Conduct and supporting evidence (i.e. corruption or malpractice to the designated authority). The Whistleblower must disclose his/her identity to facilitate for future investigation.
- 12.3 If the report is in the form of normal mail, the report is to be submitted in a sealed envelope marked "Private & Confidential" addressed to the Whistleblowing Committee at the below address :

The Whistleblowing Committee

CJ Century Logistics Holdings Berhad
No.12, Persiaran Astana / KU2,
Bandar Bukit Raja, 41050 Klang,
Selangor Darul Ehsan

13.0 ANONYMOUS REPORTS

- 13.1 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.

14.0 NOTIFICATION AND REWARD

- 14.1 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 and rewarded accordingly (if necessary).

15.0 MONITORING AND REVIEW

- 15.1 All employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected Improper Conduct.
- 15.2 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective. Any improvements identified will be made as soon as possible.

APPENDIX 1

<div style="display: flex; justify-content: space-between; align-items: center;">  <div style="text-align: center;"> <p>WHISTLEBLOWING POLICY AND PROCEDURES</p> <p>REPORT NUMBER: _____</p> <p>FORM FOR REPORTING OF IMPROPER CONDUCT</p> </div> </div> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <tr> <th colspan="2" style="text-align: left; background-color: #f2f2f2;">A. 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WHISTLEBLOWING POLICY AND PROCEDURES

REPORT NUMBER: _____

FORM FOR REPORTING OF IMPROPER CONDUCT

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1	Name of Employee:		
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How do you know this CJ Century Employee?			
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Have you lodged a complaint on this matter to another person / department / authority before?		(cross X where applicable)	
		YES :	NO :
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