

THONG GUAN INDUSTRIES BERHAD

- WHISTLEBLOWING POLICY



*Since 1942*

THONG GUAN INDUSTRIES BERHAD

(324203-K)

WHISTLEBLOWING POLICY AND PROCEDURES

THONG GUAN INDUSTRIES BERHAD

- WHISTLEBLOWING POLICY

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**1) POLICY STATEMENT**

Thong Guan Industries Berhad is committed to the highest standard of integrity, honesty and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical responsible and transparent manner.

**2) Objective**

This policy is to provide an platform for all employees of Thong Guan 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

**3) Scope of the policy**

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel.

The misconduct or criminal offence include the following

- i) Fraudulent cases.
- ii) Bribery, corruption and theft
- iii) Conflict of interest
- iv) Non-compliance with procedures
- v) Breach of law and regulation
- vi) Abuse of Power

The above list is not exhaustive and includes any act or omissions, which if proven will constitute an act of misconduct under Thong Guan Code of Ethics.

**4) Confidentiality and anonymity**

A whistleblower whether is employees or outsiders will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. The outcome of the investigation will be fed back to the whistleblower. In addition, whether the outcome reveal the mistaken of the whistleblower, there is no any adverse and detrimental action to them. This is to encourage and give confidence to complaint about the misconduct matters.

**5) Procedure of reporting for Employee**

- i) For employees who believe any misconduct exist in the workplace. The employees should report to the Head of Division or the Department manager. If the employees reluctant to do so, then the employee should report the concern to either the Managing Director of the Company or Head of Internal Audit via email or mail below:-

Email: whistleblower@thongguan.com

Mail: (Mark “**Strictly Confidential to be opened by the addressee ONLY**”)

Lot 52, Jalan PKNK 1/6, Kawasan Perindustrian Sungai Petani, 08000 Sungai Petani, Kedah.

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Attention: the Managing Director  
Dato' Ang Poon Chuan

- ii) The report and outcome will be reported to Audit committee as necessary. The report must in a form that secure the employees confidentiality. The report must support by evidence in order to proceed the investigation, if not, it could be consider false or an act of revenge. The employee complained against should be questioned, and if there is no further evidence then the employee concerned should not be unjustly punished over a false complain. This is also a check and balance for both whistle-blower and the person complained against.
- iii) Where appropriate, the matters raised may:
  - a. Make a reference to a police;
  - b. Form domestic inquiry by the Head of human Resources; and
  - c. be investigated by the internal audit or the Director and/or the related person so authorized.

**6) Procedure of reporting for Stakeholders**

- i) Stakeholders, who have suspected misconduct(s) are encouraged to lodge the report to **email or mail**. For which the Managing Director will have the access as below:-

Email: whistleblower@thongguan.com

Mail: (Mark "**Strictly Confidential to be opened by the addressee ONLY**")

Lot 52, Jalan PKNK 1/6, Kawasan Perindustrian Sungai Petani, 08000 Sungai Petani, Kedah.

Attention: the Managing Director

Dato' Ang Poon Chuan

- ii) In case of where reporting to the Management is a concern, then the report should made to the Chairman of Audit Committee as follows:

Email: whistleblower-ac@thongguan.com

Mail: (Mark "**Strictly Confidential to be opened by the addressee ONLY**")

Lot 52, Jalan PKNK 1/6, Kawasan Perindustrian Sungai Petani, 08000 Sungai Petani, Kedah.

Attention to: Chairman of Audit Committee

Mr. Chow Hon Piew

- iii) All the report received will be analyzed by Internal Audit personnel and further discussed with the Audit Committee and tabled in the audit committee meeting.

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#### **7) Function of Audit Committee**

All matters reported in rating seriousness must be tabled to Audit Committee, which is given authority to:

- i) Ensure the effective implementation of the whistle blowing practices and appropriate structure, resources and systems are in place for;
- ii) Establish procedures for reporting and handling reports received from employees and stakeholders, including to:
  - a. Appoint the right person to handle reports received and maintenance of records;
  - b. Ascertain a verification method for the reports received;
  - c. Recommend appropriate investigation approach to handle the reports received;
  - d. Set procedures to prohibit reprisal by the Company to demote, threaten, harass or discriminate in any manner against any employee reported with good faith;
  - e. Safeguard confidentiality of information in relation to the report is maintained to its fullest as possible. Information shall be provided in such manner as to safeguard as much as possible the confidentiality of the identity of the reporting person; and
  - f. Propose an immediate and appropriate corrective action to be taken to the Board of Directors in consequence of the investigation.
- iii) Report to the Board of Directors on reports and findings that required their attention and approval.

#### **8) Review**

The Whistleblowing policy will review by the Management and Board of Director periodically to ensure that it continue to remain relevant and appropriate.

The policy had been adopted by the Board on 23 April 2018.