

CAELY HOLDINGS BHD

WHISTLEBLOWING POLICY



Introduction

As a responsible corporation, we commit to conduct our business activities with integrity, law-abiding spirit and the highest ethical standard. As such, all employees and stakeholders are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way. So that corrective action can be taken as soon as possible.

Purpose

This policy is designed to:

- Support the company's values *of corporate and social responsibilities*;
- Ensure employees can raise concerns without fear of reprisals; and
- Provide a *robust, transparent and confidential communication and process* for dealing with concerns.

Scope And Application

This policy not only covers possible improprieties in matters of financial reporting, but also:

- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Endangerment of an individual's health and safety;
- *Acts that adversely affect the interests or values of shareholders and stakeholders*;
- *Unauthorised disclosure of company information*;
- *Falsification of reports or documents*;
- *Theft, embezzlement or misuse of company assets*;
- *Improper or undesirable personal behaviour or misdeeds which seriously impacts our company's business and reputation*;
- *Sexual and other forms of harassment in the workplace*; and
- Concealment of any or a combination of the above.

It is advisable for a potential whistleblower to consider whether the alleged improper conduct to be disclosed to the Company falls within any of the above, prior to making the disclosure.

Principles

The principles underpinning the policy are as follows:

- All concerns raised will be treated fairly and properly;
- The company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- The company will ensure that any individual raising a concern is aware of who is handling the matter; and
- The company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The company, however, does not extend this assurance to someone who maliciously raises a matter he/she knows is untrue.

This Policy is not intended for employees to lodge employees' grievances or appeal on disciplinary procedures. Employees can report their grievances or lodge appeals on disciplinary procedures through our company's Human Resource Department.

Grievance Procedure

If any employee *and/or stakeholder* believes reasonably and in good faith that malpractice exists in the work place, the employee *and/or stakeholder* should report this immediately to his/ her manager. However, if for any reason the employee *and/or stakeholder* is reluctant to do so, then the employee *and/or stakeholder* should report the concerns to either the:

- Chairman of the Board; or
- Chairman of Audit Committee.

The contact details of the Chairman of the Board and Chairman of Audit Committee where concerns can be raised by the employee are as follow:

Chairman of the Board: Datin Theresa Fong	Chairman of Audit Committee : Mr Ng Boon Kang
Phone: 05-621 8888	Phone : 016-4168699
Email: theresafong@classita.com.my	Email : crestcons@gmail.com

Employees and/or stakeholders making a whistleblowing report should disclose their

- Full name;*
- NRIC/Employee number; and*
- Contact details such as telephone number and email address.*

OR

They may choose to make the report on an anonymous basis.

Whistleblowing reports should include the following details:-

- Background of the concern;*
- Reason for the concern; and*
- Identity of the person committing the alleged wrondoings;*

Insufficient details in the whistleblowing report may impede the investigation and resolution of the concerns raised.

The employee *and/or stakeholder's* concerns will be reported to the company without revealing the identity of the employee *and/or stakeholder* unless prior consent from the employee *and/or stakeholder* was obtained.

The employees *and/or stakeholder* who have raised concerns will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

Where concerns cannot be resolved without revealing the identity of the employee *and/or stakeholder* raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee *and/or stakeholder* concerned as to whether and how the matter can proceed.

All reports will be investigated promptly, *fairly and objectively* by the *Audit Committee*. If required, the Chairman of the Board and Audit Committee Chairman can obtain assistance from other resources. *The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact finding process.* The progress of investigation will be reported to the Audit Committee *regularly until the completion of the investigation.*

Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately. *Where any member of the Audit Committee is the subject of the investigation, the member will be secluded from attending the meeting of the Committee when the subject issue is being discussed.*

Where possible, steps will also be implemented to prevent similar situation *from arising.*

The Audit Committee will keep a record of all steps taken in response to each whistleblowing report received as well as how's the concerns raised were resolved.

Protection And Confidentiality

The Company is committed to provide the whistleblower protection as outlined under the Whistleblower Protection Act 2010. The following protection will be accorded to a whistleblower who makes a disclosure of improper conduct to the Company in good faith:-

- (i) Confidentiality of identity;*
- (ii) Immunity from civil and criminal liability for the disclosure made; and*
- (iii) Protection from detrimental action.*

Exclusion From Protection

Potential whistleblower are also reminded that there may be instances wherein their protection would be revoked or excluded. The whistleblower protection does not extend to the following disclosures and will be revoked by the Company pursuant to section 11 of the Whistleblower Protection Act 2010:-

- (i) Where the disclosures of improper conduct which are :*

- (a) *Frivolous or vexatious;*
 - (b) *Principally questioning the merits of government policy, including policy of a public body;*
 - (c) *Known to the whistleblower to be false or untrue; or*
 - (d) *Made solely or substantially to avoid dismissal or other disciplinary action;*
- (ii) *Where the whistleblower has participated in the improper conduct so disclosed;*
 - (iii) *Where the whistleblower commits an offence under the Whistleblower Protection Act 2010; or*
 - (iv) *Where the disclosures of improper conduct which contain information specifically prohibited from being disclosed under any written law such as the Official Secrets Act 1972.*

Any person who makes disclosure of improper conduct to the Company, knowing and believing that any material statements in the disclosure is false or untrue commits a criminal offence under the Whistleblower Protection Act 2010.

This Policy was last updated on 25th February, 2020