



**JMR CONGLOMERATION BHD.** (592280-W)  
(Incorporated in Malaysia)

**WHISTLEBLOWING POLICY**

**1) POLICY STATEMENT**

- a) JMR Conglomeration Bhd. (“JMR” or the “Company”) and its subsidiaries (collectively referred to as the “Group”) are committed to the highest standard of integrity and maintaining high standard of accountability in the conduct of its businesses and operations. The Group aspires to conduct its affairs in an ethical, responsible and transparent manner which is vital to the success of the Group.
- b) In order to achieve and maintain these standards and good behavior at work through the Policy, the Company encourages the employees / other stakeholders to make any disclosures openly and honestly and that concerns / complaints raised will be treated fairly and properly.
- c) In this regard, the Group is committed to developing a culture of openness and honesty where a person who is aware of a potential malpractice or misconduct is encouraged to report such matters, in good faith, without fear of reprisal.
- d) The Group has in place a Whistleblowing Policy that sets out the channels and procedures for reporting improper conduct involving the employees of the Group and the protection accorded to Whistleblowers.
- e) All disclosures made under this Policy will be dealt with in a confidential manner. Disclosures received under anonymity will not be entertained to prevent invalid malicious reporting, poison letters, exploitation and victimization.
- f) The Group views false and malicious allegations in any form or manner and the parties responsible may be subject to appropriate disciplinary action, including legal actions where applicable.

**2) WHISTLEBLOWING**

- a) Whistleblowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.
- b) Only genuine concerns should be reported under Whistleblowing 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 the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

**3) TYPES OF IMPROPER CONDUCT**

Parties can report a whistleblowing complaint if they are aware of any improper conduct, including but not limited to the following:-

- a) Criminal offence or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail;
- b) misappropriation of company’s funds, securities, supplies or other assets;



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- c) non-compliance with legal or regulatory requirements;
- d) sexual harassment;
- e) misuse of confidential information;
- f) abuse of power and position for personal gain;
- g) an act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
- h) giving false or misleading information (including suppression of any material facts or information); and
- i) the deliberate concealment of any of the above matter or other acts of wrong doing.

4) **WHISTLEBLOWING CHANNELS**

- a) Parties submitting the complaints via emails, faxes or letters, should disclose their names, contact number, details of person(s) involved, nature of allegation, when and where the incident took place and provide evidence, if possible.
- b) Report regarding the Company's employees, vendors, consultants and/or business associates:-

Name	:	Dato' Ir. Dr. Goh Yong Chee
Designation	:	Group Managing Director
Email	:	gohyc@jmr.com.my
Telephone	:	+604-264 4993 / 5 / 6 / 7
Fax	:	+604-264 5122
Mail	:	JMR Conglomeration Bhd. 65, Sri Bahari Road, 10050 Penang. Attention: Group Managing Director (Please mark "Strictly Confidential")

- c) Report regarding the Company's management and/or directors:-

Name	:	Tan Yen Yeow
Designation	:	Chairman of Audit Committee
Email	:	hq3@jmr.com.my
Telephone	:	+604-264 4993 / 5 / 6 / 7
Fax	:	+604-264 5122
Mail	:	JMR Conglomeration Berhad 65, Sri Bahari Road, 10050 Penang. Attention: Chairman of Audit Committee (Please mark "Strictly Confidential")