



WHISTLEBLOWING POLICY

1. OBJECTIVES

This Whistleblowing Policy is to provide an avenue for any person including all employees of SKP Resources Bhd ("the Company") and its Group of Companies ("SKP") to report concerns about any suspected and/or known improper conduct that they may observe in SKP.

2. SCOPE OF THE POLICY

2.1 This Policy covers possible improper conduct such as:-

- a) Fraud;
- b) Corruption, bribery or blackmail;
- c) Criminal offences;
- d) Theft or embezzlement;
- e) Abuse of power;
- f) Conflict of Interest;
- g) Misuse of SKP's Property;
- h) Failure to comply with a legal or regulatory obligation;
- i) Miscarriage of justice;
- j) Unfair treatment;
- k) Discrimination;
- l) Endangerment of an individual's health and safety;
- m) Money laundering; and
- n) Concealment of any or a combination of the above.

2.2 The improper conduct under Paragraph 2.1 above is not exhaustive and includes any other act or omission, which if proven, will constitute an act of misconduct under SKP's *Code of Ethics and Conduct*, disciplinary offence under the relevant policies and procedures of SKP or criminal offence under relevant legislations in force.

2.3 SKP expects all parties to act in good faith with a reasonable belief that the information and allegations are substantially true.

2.4 If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

2.5 All confidential reporting or disclosures by a whistleblower are to be directed to the designated person in accordance with the procedures under this Policy.

- 2.6 This Policy is not intended as a means for employees to pursue personal grievances which shall be channeled through the grievances procedures in order to enable appropriate action to be taken and any form of restitution to be made, if applicable. Whistleblowing procedures differs from grievances procedures in most cases as whistleblower are expected not to be affected in personal capacity.

3. PROTECTION TO WHISTLEBLOWER

- 3.1 SKP will take all reasonable steps to protect the confidentiality of identity of a whistleblower, to the extent reasonably practicable and will adhere to any statutory requirements in force.
- 3.2 Any employee of SKP who whistle-blow will also be protected against any adverse and detrimental actions in reprisal for disclosing any improper conduct committed or about to be committed within SKP, to the extent reasonably practicable, provided that the disclosure is made in good faith.
- 3.3 Such protection will continue notwithstanding that the investigation later reveals that the whistleblower is mistaken as to the facts, rules and procedures of improper conduct.
- 3.4 The whistleblower remains liable for his/ her own conduct and is responsible to ensure that disclosure is made in good faith and free from any malicious intent. SKP does not have the power to offer any person immunity against prosecution in the criminal jurisdiction.
- 3.5 SKP may revoke the protection accorded to a whistleblower under the following circumstances, among others:-
- a) the whistleblower participated in the improper conduct;
 - b) the whistleblower willfully discloses a false statement;
 - c) the disclosure is made with malicious intent;
 - d) the disclosure is frivolous or vexatious; or
 - e) the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

4. ANONYMOUS WHISTLEBLOWER

- 4.1 SKP will not entertain any anonymous disclosure. The person who wishes to whistle-blow any improper conduct within SKP is required to disclose his/her name, NRIC number and contact number. These identity details will be kept confidential to accord protection to the whistleblower.

4.2 However, SKP reserves its right to investigate into any anonymous disclosure.

5. REPORTING PROCEDURES

5.1 All disclosures are to be channeled in accordance with the procedures provided herein.

5.2 Disclosures can be made in strict confidential manner, marked "Confidential" to:-

The Chairman of Audit Committee
SKP Resources Bhd
No. 421, 4th Miles, Jalan Kluang
83000 Batu Pahat
Johor Darul Takzim
auditcom@skpres.com

5.3 As it is essential for SKP to have all critical information in order to be able to effectively evaluate and investigate a complaint, the disclosures made herein should provide as much detail and be as specific as possible. The disclosures should contain the following information, together with the personal details of the whistleblower such as name, NRIC number and contact number:-

- a) Details of the person(s) involved;
- b) Details of the allegations such as nature, time and place;
- c) Other relevant information; and
- d) Any supporting evidence.

5.4 All disclosures received will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

5.5 At the appropriate time, the party making the disclosures may need to come forward as a witness.

6. HANDLING OF COMPLAINTS

6.1 The Chairman of Audit Committee, may, direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate for the conduct of the investigation and to undertake any remedial action, in accordance with any applicable laws and regulations.

- 6.2 SKP reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees, who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.
- 6.3 If, at the conclusion of an investigation, SKP determines that a violation has occurred or the allegations are substantiated, remedial action commensurate with the severity of the offence will be taken.

7. REVIEW OF THIS POLICY

- 7.1 SKP reserves the right to amend this Policy from time to time to maintain compliance with applicable laws and regulations or accommodate organizational changes within SKP.