

HHRG BERHAD
Company No. 201101041555 (969678-D)
(Incorporated in Malaysia)

Whistleblowing Policy

1. Introduction and Objective

HHRG Berhad and subsidiaries “HHRG” committed to developing to establish a corporate culture which engenders ethical conduct that permeates throughout the company and ensure the implementation of appropriate internal systems to support, promote and ensure its compliance.

In this regard, for any miss-conducting or unappropriated on company operation, you can convert should include appropriate communication and feedback channels which facilitate whistle-blowing.

The Board should periodically review the code of conduct. A summary of the code of conduct should be made available on the corporate website.

2. Definition of Proper Code of Conduct

An improper conduct is any act or omission, which if proven, will constitute an act of misconduct pursuant to HHRG's Code of Business Ethics and/or a criminal offence under the relevant law in force and may include any of the following;

- i. Criminal offense or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail;
- ii. Forgery or alteration of any document or account belonging to HHRG Group;
- iii. Forgery or alteration of a cheque, bank draft, or any other financial document;
- iv. Misappropriation of company's funds, securities, supplies, or other assets;
- v. Impropriety in the handling or reporting of money or financial transactions;
- vi. Profiteering as a result of insider knowledge of the Group's activities;
- vii. Conduct which is an offence or a breach of law;
- viii. Financial malpractice;
- ix. Breach of the Group's Code of Business Ethics;
- x. Abuse of power and position for personal gain;
- xi. Any act that poses danger to health and safety;
- xii. Any act that causes damage to environment; and
- xiii. Concealment of any of the above.



3. Channels of Reporting

If you are aware of an improper conduct, you may make a disclose using following channels:

Email address : hhr@hhr.com.my

Reports received anonymously will not be entertained. Individual will need to reveal his/her identity during a report.

Upon completion of investigation, appropriate course of action will be recommended to the Audit and Risk Management Committee for their deliberation. Decision taken by the Audit and Risk Management Committee will be implemented immediately.

4. Term of Reference

- i. The Whistleblower should promptly report the suspected or actual event to his/her supervisor.
- ii. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower could report the event to the next highest or another level of management, including to an appropriate Board committee or member.
- iii. The Whistleblower can report the event with his/her identity or anonymously.
- iv. The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.
- v. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.
- vi. Crimes against person or property, such as assault, rape, burglary, et-cetera, should immediately be reported to local law enforcement personnel.
- vii. Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.
- viii. The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.
- ix. If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
- x. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.