



Factory A : Lot 3611 (Ptd 4447),Kawasan Perindustrian Bukit Bakri,Mukim Bakri,84200 Muar, Johor, Malaysia

Factory B : Lot PTD 7274, Kawasan Perindustrian Bakri Batu 7 1/2, Jln Bakri, 84200 Muar, Johor.

Tel : 06-986 8558 / 06-986 8668 Fax : 06-986 8787

Website : www.ecomate.com.my

Whistle-Blowing Policy

Whistle Blowing Policy		
Prepared By:	Effective Date:	Version Number: 3.0
Management	21 December 2020	
Approved By:	Revision Date:	
Board of directors	09 June 2023	

INTRODUCTION

Whistleblowing is defined as a deliberate, voluntary disclosure or reporting of an individual or an organisational malpractice by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated improper activities as stated here below within the Company's and that is within its ability to control.

Whistleblowing encourages and enables employees to raise serious concerns within the organisation rather than overlooking a problem or 'blowing the whistle' outside. Employees are often the first to realise that there is something seriously wrong within the organisation. However, they may not express their concerns as they feel that speaking up would be disloyal to their colleagues or to the organisation.

ORGANISATION COMMITMENTS

ECOMATE Holdings Berhad ("Company") and its group of companies ("the Group") are committed to the highest possible standard of openness, probity and accountability to foster an environment where high standards of integrity and ethical behaviour of its directors, management and employees are maintained. In line with that commitment the Company encourages its employees, contractors, suppliers, customers, stakeholders and others whom we deal with, who have concerns about any aspect of the organisation to come forward and voice those concerns.

WHAT TYPE OF CONCERNS ARE COVERED?

- All low cases at start, conduct which is an offence or a breach of law
- Non-compliance with Regulatory Requirements
- Disclosure related to miscarriages of justice and discriminations
- Possible fraud, corruption, bribery and blackmail.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- False Financial Statement Reporting
- Breach of Code of Ethics and Conduct
- Abuse of Power/Authority or Company Properties

- Other Improper conducts are provided in Appendix 1

PURPOSE

Our company, Ecomate Holdings Berhad is committed to create value and contribute to society's progress and development through our business activities. As a responsible company, we will commit to conduct our business activities with integrity, a law-abiding spirit and the highest ethical standards.

This Whistleblowing Policy aims to establish a robust, transparent and accountable communication channel for Employees and Stakeholders of our company to voice their concerns in an effective, responsible and secured manner when they become aware of actual or potential wrongdoings that will cause us to fall short of our social and corporate responsibilities; and enable us to take swift, fair and effective corrective actions that will enable us to comply with our social and corporate responsibilities and maintain the support and trust of Employees and Stakeholders.

DEFINITIONS

In this Whistleblowing Policy, the following terms have the following definitions:

“Code of Conduct” means the Ecomate Holdings Berhad Code of Conduct;

“Employees” means all board of directors, executive officers, members of management, regular employees and contracted employees having employment relationships with our company, as well as temporary staff and seconded employees working under the control and supervision of our company;

“Employee Grievances” applies to personal dissatisfaction or complaints by Employees that are related to their employment and working conditions;

“Stakeholders” means third party suppliers, contractors, agents, consultants, distributors, customers and such other business partner which has direct or indirect business dealings with our company;

“Whistleblowing Committee” means not less than three members who shall be appointed by the Board;

“Whistleblowing Investigation Team” means the officer appointed by the Whistleblowing Committee within 10 calendar days upon received of the whistleblowing report;

“Whistleblowing Policy” or “Policy” means this whistleblowing policy, including any subsequent revisions and supplemental guidelines;

SCOPE AND APPLICATION

This Policy provides a system that enables our company’s Employees and Stakeholders acting in good faith to raise concerns and disclose actual or potential wrongdoings or misconduct in our company. These wrongdoings or misconduct include but are not limited to (i) violation of laws and regulations, (ii) unethical behaviour or breach of Code of Conduct, (iii) giving, solicitation or acceptance of bribes, (iv) acts that adversely affect the interests or values of shareholders and Stakeholders, (v) unauthorized disclosure or sale of company information, (vi) falsification of reports or documents, (vii) fraud, theft, embezzlement or misuse of company assets, (viii) improper or undesirable personal behaviour or misdeeds which seriously impacts our company’s business or reputation, (ix) sexual or other forms of harassment in the workplace; and (x) attempts to cover any of the aforementioned.

Employees and Stakeholders who raise their concerns in good faith in accordance with this Policy are protected from reprisals within the limits of the law and assured that all reported cases will be objectively investigated on a best effort basis and appropriate remedial measures taken where warranted. This Policy is not intended to restrict or otherwise govern legal rights and obligations which Employees and Stakeholder have, or may have, in relation to the subject matter of the whistleblowing report.

This Policy is not intended for Employees to lodge Employee Grievances or appeal on disciplinary procedures. Employees can report Employee Grievances or lodge appeals on disciplinary procedures through our company’s human resources department.

Employees and Stakeholders should exercise due care to ensure that the information in their whistleblowing report is accurate and truthful. No action will be taken against Employees or Stakeholders who make an allegation in good faith which is not confirmed by subsequent investigation. But this protection may be revoked if Employees and Stakeholders misuse or abuse the Whistleblowing Policy by making false, frivolous, malicious or vexatious allegations.

HOW TO MAKE A WHISTLEBLOWING REPORT

Employees and Stakeholders should report their concern at the earliest opportunity so that corrective action can be taken as soon as possible.

Whistle-Blowing Policy

The monitoring and execution of this Whistleblowing Policy will be placed under the supervision of the Whistleblowing Committee comprising the following:

- (i) Members of our company's Audit and Risk Management Committee ("ARMC"); and
- (ii) Managing Director of our company.

The ARMC Chairman shall be the chair for the meeting of the Whistleblowing Committee where a quorum of no less than two (2) members are present and, in his absence, another member of the ARMC shall be the chair.

Where any member of the Whistleblowing Committee is the subject of the investigation, the member will be recluses from attending any meeting of the Committee.

Employees and Stakeholders have the option to make whistleblowing reports in strict confidence through any of the following channels:

Reporting Mode	Contact Details
Letter (Fill up the Whistleblowing Form in Appendix 2)	Lim Yik Hui Lot PTD 7274, Kawasan Perindustrian Bakri Batu 7 ½, Jalan Bakri, 84200 Muar, Johor.
Submission	Chairman of Audit and Risk Management Committee
Electronic mail	whistle-blowing@ecomate.com.my

Employees and Stakeholders making a whistleblowing report should disclose their (i) full name, (ii) NRIC and/or Employee Number (if applicable), as well as (iii) contact details such as telephone number and email address. This will enable our company to accord the person making the whistleblowing report necessary protection under this Policy and also obtain more details pertaining to the whistleblowing report.

Reports may be made on an anonymous basis. However, natural justice usually requires that the details and identity of the Employee or Stakeholder submitting the whistleblowing report be disclosed in any disciplinary investigation or action to be taken against the person(s) who is a subject of the complaint in the whistleblowing report. Anonymous whistleblowing reports will therefore be considered at the discretion of the Whistleblowing committee. In exercising this discretion, the Whistleblowing Committee will consider (i) the seriousness of the issues raised, (ii) credibility of the whistleblowing report, and (iii) likelihood of confirming the allegation from the relevant sources.

Whistleblowing reports should include the following disclosures: (i) background and history of the concern (giving relevant dates), (ii) reason for the concern, and (iii) identity of the person(s) committing the alleged wrongdoing. Insufficient details in the whistleblowing report may impede the investigation and resolution of the concerns raised. The committee shall be entitled to reject unreliable whistle blower report for failing to provide sufficient details and disclosure.

WHISTLEBLOWING INVESTIGATION

Upon receipt of the whistleblowing report, the Whistleblowing Committee will as soon as practicable establish a Whistleblowing Investigation Team comprising appropriate and suitably qualified personnel to investigate the concerns disclosed in the whistleblowing report in a fair and objective manner and at its discretion, consider involving any other or additional officer of the Company and/or Committee and/or an outside agency for the purpose of investigation. The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact-finding process. If the Whistleblowing Investigation Team finds that the alleged wrongdoing or misconduct is true, our company will take appropriate actions including disciplinary action, termination of contract and establishing new controls to prevent recurrence of the wrongdoing or misconduct in our company.

A member of the Whistleblowing Investigation team or an officer appointed by the Whistleblowing Committee will within 10 calendar days, contact the person who submitted the whistleblowing report to (i) acknowledge that the report has been received, and (ii) indicate how the report will be dealt. The Whistleblowing Committee is not obliged to contact the persons who submitted the whistleblowing report anonymously, exclude contact details or do not report in good faith.

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

The Whistleblowing Committee will report their findings to the ARMC and Board of Directors.

The Whistleblowing Committee will inform the Whistle-blower the completion of investigation but, the details of the findings shall not be disclosed to the Whistle-blower.

CONFIDENTIALITY AND SAFEGUARDS

All whistleblowing reports will be treated as confidential to the extent reasonably practicable. The identity of the Employee or Stakeholder who submitted the whistleblowing report may be kept confidential so long as it does not impede or frustrate investigation. The investigation process may also reveal the source of the information and the Employee or Stakeholder who raised the concern may be required to provide a statement as part of the evidence.

This Whistleblowing Policy offers protection within limits of the law and to the extent reasonably practicable to Employees and Stakeholders who submit whistleblowing reports internally in good faith, even if the allegations prove to be unfounded or mistaken. These Employees and Stakeholders will be appropriately protected from internal disciplinary actions (if applicable), dismissal, harassment,

victimization or informal pressures. No protection from internal disciplinary action will be offered if Employees do not adhere to the procedures for whistleblowing and disclosures in this Policy.

REVIEW OF POLICY

The Board of Directors or ARMC can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulation and/or accommodate organizational changes within the Company or Group. However, the modification made shall be effective after the same is circulated to employees in writing or electronically.

This Policy was updated and adopted by the Board on 09 June 2023 and is made available on the Company's website, www.ecomate.com.my.

Appendix 1

List of Complaints under Whistleblowing Policy

The list of complaints / concerns includes, but is not limited to:

- Any dishonest or fraudulent act
- Any act of conflict of interest with suppliers, vendors or contractors
- Acceptance of fictitious quotations from suppliers, vendors or contractors in favouring for a particular entity
- Breaching of legal obligation
- Corruption or bribery
- Destruction, removal or inappropriate use of the Company's records, furniture, fixtures and equipment
- Falsifying payroll records or overtime claims
- Falsifying travel and entertainment expenses and/or utilizing company funds to pay for personal expenses
- Fictitious reporting or receipts, delivery orders, etc. from suppliers or shipment to customers
- Forgery or alteration of any document or account belonging to the company
- Forgery or alteration of a cheque, bank draft or any other financial document
- Inventory or asset theft
- Misappropriation or theft of funds, supplies or other assets
- Providing or accepting gifts or material value to/from customers, contractors, vendors or other persons doing or attempting to do business with the Company or its Group of Companies that are intended to influence a business decision or selection process
- Misappropriation of Company-owned computer hardware, software, data, etc.
- Misuse of company information
- Sexual harassment
- Any other detrimental wrongdoing which nature of the wrongdoing is subject to absolute discretion of the Committee. Any action which is intended to conceal any of the above.

Appendix 2

WHISTLE BLOWER FORM

WHISTLE BLOWING REPORT		
To:		
Incident Details		
Date:	Time:	Location:
Type of Improper activity/conduct :		
Details of suspected personnel involved :		
Information on incident : <i>(Please use attachment if necessary)</i> <i>(The complaint shall support with documents physical evidence)</i>		

Signature : _____

Name : _____

Date : _____

Company/Department : _____

*Contact No : _____

**Contact No is compulsory in order to reach out the whistleblower for further clarification and notify the outcome of the report.*