

HUMAN RESOURCES POLICIES AND GUIDELINES

Whistleblower Policy

TABLE OF CONTENTS

	Page
1.0 Overview	1
2.0 Definitions	1
3.0 Procedures	1
4.0 Reporting and Retention of Complaints and Investigations	2
5.0 Responsibility	2
6.0 Conclusion	

1. Overview

To describe and provide an avenue or course of action an employee, customer suppliers or third parties, can take to escalate any wrong doing including fraud, favors any acts to deceive for monetary gains or otherwise act to discredit or cheat committed by the management and employees of Lysaght Group.

This is to ensure Lysaght Group conducts its business with highest standard of integrity and honesty.

This policy is consistent with, and made part of the Lysaght Group's Code of Business Conduct and Corporate Governance. Employees are encouraged to discuss with supervisors, managers or other appropriate personnel, when in doubt, about the best and ethical course of action in a particular situation.

2. Definitions

For purposes of this policy:

- (1) **Good Faith.** Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true. A report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious, false or if the maker is reckless as to the truth of the allegation.
- (2) **Wrongdoing.** Examples of wrongdoing include, but are not limited to fraud, including financial fraud and accounting fraud, violation of laws and regulations, violations of Company policies, unethical behavior or practices, endangerment to public health or safety and negligence of duty.
- (3) **Adverse Employment Action.** Examples of adverse employment action include, but are not limited to, demotion, suspension, termination, transfer to a lesser position, denial of promotions, denial of benefits, threats, harassment or denial of compensation as a result of the employee's report of wrongdoing, or any manner of discrimination against an employee in the terms and conditions of employment because of any other lawful act done by the employee pursuant to this policy or in compliance with the laws of the country.

3. Procedure

Any employee, customer, suppliers, or third parties may submit reports against an employee or the management, if he is aware or reasonably believes in good faith that there were acts of wrong doing being committed.

The whistleblower may register any wrong doing/act committed by the Staff/Management of the Lysaght Group with the Senior Independent Director (SID).

The whistle blower shall file a report with details of the matters concerned. The report will be treated in the strictest of confidence and no action shall be taken against the whistle blower in accordance with the Whistleblower Protection Act 2010.

The SID as the administrator of the whistleblower policy shall oversee investigate and determine the impact of such allegation(s) on Lysaght Group's financials, reputation, standing and character.

If the allegation has a financial impact or would cause damage to the reputation or embarrassment to Lysaght Group, the SID shall escalate the matters to the Board.

Submission of Complaints

Any person, including employees, with a concern or complaint may submit their concern or complaint in writing to the SID by mail or through email as follows:

Senior Independent Director,
Email : complaints@lysaghtmarketing.com.my
Address : No. 11, Jalan Majistret U1/26, Seksyen U1, Hicom Glenmarie
Industrial Park, 40150 Shah Alam, Selangor Darul Ehsan

The person submitting a complaint should include a contact number and/or address in the submission at which he or she may be contacted if the person requests to be contacted or if the SID determines that contact is appropriate.

4. Reporting and Retention of Complaints and Investigations

The SID shall maintain a log of all concerns or complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the Board.

5. Responsibility

Chief Executive Officer and the respective General Managers, Head of Functions and Head of Departments are to ensure that all employees understand and acknowledge the importance and need for Whistleblower Procedure. It is to ensure Lysaght Group conduct its business with the highest standard of integrity and honesty and in fulfilling its mission/objective.

6. Conclusion

This policy supersede all other previous policies and is subject to amendments at the discretion of the Board. Any areas not covered by the above will be dealt with at the discretion of the Management.