

POLICY ON WHISTLE BLOWING

A) **GENERAL STATEMENT**

Whistle Blowing is an act of exposing wrongdoing, misconduct, or unethical activity within the organisation. This section explains the guidelines on our Whistle Blowing Policy. This policy is intended to provide an avenue for employees to expose secretive information or activity within the organisation that is deemed illegal, unethical, or not correct. In return the complainant shall be given protection from any form of reprisals or victimization for his/her act of whistleblowing which was done in good faith.

B) **SCOPE**

This Whistleblowing Policy applies to OCB Berhad (“the Company”) and all its subsidiary companies including all employees (whether permanent, contract, part-time or casual), Directors, Shareholders, Consultants, Vendors, Contractors, external agencies or any parties with a business relationship with the Company or its subsidiaries.

C) **POLICY**

This policy is intended to encourage in confidence the exposure of real or perceived irregularities that are taking place.

1. **Integrity**

Business Integrity is the key standard for the selection and retention of those who represent OCB Berhad. They will display high integrity value, irrespective of dealing with internal staff or external parties. OCB Berhad will observe and adhere to the standard procedures and must respect one another so that all will be treated equally and fairly. Paying bribes or kickbacks, engaging in industrial espionage, leaking data on OCB Berhad customers’ information to 3rd Party without authority, or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage and could result in violations of the law.

2. **Anti-Bribery & Corruption Policy**

Any form of bribery and corruption is prohibited. OCB Berhad and any third party acting on behalf of OCB Berhad must not provide, offer or accept bribes, kickbacks, corrupt payments, facilitation payments, or inappropriate gifts. OCB Berhad and any third party acting on behalf of OCB Berhad must comply with all applicable anti-bribery laws and regulations.

3. This policy will be in conjunction with the Policy on Corporate Code of Conduct.

The objective of this Policy:

- a) To deter all wrong doing and to promote high standards of good corporate practices.
- b) To provide proper avenues, channel or platform to raise or report on any concern/issues about actual or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken on the wrong doings such as and not limited to fraud, thefts, dishonest acts, profiteering as a result of insider knowledge, accepting or giving bribes, intimidation, discrimination or harassment of staff , misappropriation of funds, disclosure of confidential information or documents to external parties, conflict of interests in business dealing with external parties or involved in prohibited activities.
- c) To give employees the assurance that they will be protected from reprisals or victimization for whistle blowing in good faith.
- d) The results of the investigation will only be disclosed to the whistle blower, if the whistle blower identifies himself/herself.

The channels for reporting of such concerns or matters are either via telephone, email and letters.

4. **COMMUNICATION CHANNEL**

- a) Disclosure of information should initially and promptly be made by the Whistleblower to one or more of the following persons within the Company:
 - Tan Sri Dato' Nik Ibrahim Kamil Bin Tan Sri Dato' Nik Ahmad Kamil
(Senior Independent Non-Executive Chairman)
 - Zakaria Merican Bin Osman Merican
(Independent Non-Executive Director)
 - Abd Aziz Bin Attan
(Independent Non-Executive Director)
 - Wong Choon Shein
(Non-Independent Non-Executive Director)
 - Fong Heng Leong
(Non-Independent Non-Executive Director)
 - Mohd Harris Bin Pardi
(Chief Operating Officer cum Executive Director)

- b) Report or disclosure under this Policy can be made through writing by email or mail addressed to the above persons as below.

<u>Mailing Address:</u>	<u>Email Address:</u>
OCB Berhad 2B-5, Level 5 Jalan SS 6/6, Kelana Jaya 47301 Petaling Jaya Selangor Darul Ehsan, Malaysia	Group Company Secretary Ms. Tan Bee Keng bktan@ocbb.com.my

- An employee concerned about speaking in confidence to another member of staff can speak directly to the Chief Operating Officer cum Executive Director – Mohd Harris Bin Pardi at harris@ocbb.com.my.

5. CONFIDENTIALITY & PROTECTION

- a) A Whistleblower must identify himself / herself when submitting a complaint / disclosure. Upon making the disclosure in good faith:
- The Whistleblower will be protected from any form of reprisal from within the Company or its subsidiaries as a direct consequence of the disclosure.
 - The Whistleblower's identity shall be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against the Company;
 - The identity and personal information of the Whistleblower and the alleged wrongdoer may be revealed to persons involved in the investigations of the wrong doings.
- b) Protection under 5(a) above will be accorded by the Company only when the Whistleblower satisfies all the following conditions:
- The disclosure is done in good faith;
 - The Whistleblower is aware that the information and any allegations disclosed are true;
 - The Whistleblower has not communicated the disclosure to any other party not related to the disclosures;
 - The disclosure made is not for personal gain or interest.
- c) The Company views seriously any false, malicious or defamatory allegation. This can be considered as gross misconduct where appropriate disciplinary action may be taken by the Company.

- d) Suppliers/ Vendors of the Company and members of the public who become a Whistleblower will also be protected by the Company as to his/her/its identity subject to satisfying all conditions in 5(b) above.
- d) Employee and industrial relations related issues and human resources related issues are excluded from the operation of this Policy because they are other established mechanisms to raise such complaints.
- e) The Company will treat all such disclosures/reports in a confidential and sensitive manner and will only reveal information on a “need to know” basis or if required by law, the court or regulatory authority. Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required. The employees’ identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern, we will enter into a dialogue with the employee concerned as to whether and how we can proceed.

3. REVIEW OF THIS POLICY

The Board of Directors reserve the right to change, add, suspend, cancel, remove, discontinue or otherwise 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.

OCB BERHAD

MOHD HARRIS BIN PARDI

Chief Operating Officer cum Executive Director