



L&P Global Berhad

Registration No. 202101028085 (1428385-M)
(Incorporated in Malaysia)

WHISTLE BLOWING POLICY

Revision History

Version	Description	Prepared by:	Reviewed by:	Approved by:	Effective Date
000	Approval of Policy	Ow CK	Executive Directors	Board of Directors	27/4/22
001	Amendments	Ow CK	Executive Directors	Board of Directors	30/7/24
002	Amendments	Ow CK	Executive Directors	Board of Directors	13/11/24

WHISTLE BLOWING POLICY

1. INTRODUCTION

- 1.1. Whistle blowing is a form of disclosure. It involves a person, i.e. the whistleblower raising serious concerns at an early stage about risks of wrongful activities or reporting a wrongdoing.
- 1.2. L&P Global Berhad (“**L&P** ” or “**the Company**”) and its group of subsidiaries (“**the Group**”) is committed to observe high business standards and strong personal ethics when discharging their duties and responsibilities. Integrity must be observed at all times and emphasis must be placed on compliance with all applicable laws and regulations.
- 1.3 All Directors, employees, shareholders, suppliers, customers and other stakeholders of the Group are called upon to report genuine concerns on misconducts which implicate a wrongdoer within the Group.
- 1.4 The Company has introduced this policy to encourage all stakeholders (shareholders, customers and suppliers) and employees of the Group to report or provide any information that is evidence of illegal or immoral conduct or malpractices in the Group.

2. PURPOSE

- 2.1. This Whistle Blowing Policy (“**Policy**”) is intended to reflect a robust whistleblowing approach that can deter current and future misconducts. Bona fide concerns relating to misconducts involving employees and Directors within the Group can be reported in accordance with the stipulations encapsulated in this Policy.
- 2.2. All Directors and employees of the Group are required to comply with the Malaysian Anti-Corruption Commission Act 2009. Section 25(1) of the Malaysian Anti-Corruption Commission Act 2009 states that: “Any person to whom any gratification is given, promised or offered, in contravention of any provision of this Act shall report such gift, promise or offer together with the name, if known, of the person who gave, promised or offered such gratification to him to the nearest officer of the Commission or police officer”.
- 2.3. The purposes of establishing this Policy are as follows:
 - Encourage whistleblower to be confident in raising serious genuine concerns and to question and act on those concerns;
 - Facilitates early disclosure in a responsible manner by establishing procedures for stakeholders to raise genuine concerns or allegations through an appropriate channel upon discovery of possible wrongdoing(s);

- Addresses disclosure in an appropriate and timely manner. Disclosed matters may be prioritised according to the nature or seriousness of the alleged wrongdoing(s) or reported risk(s) and the magnitude of the impact;
- Protects identity of whistleblower upon receipt of report on a confidential and anonymous basis; and
- Treats both whistleblower and alleged wrongdoer fairly. Status of disclosure shall be informed to the whistleblower while alleged wrongdoer will be informed of the allegations at an appropriate time and be given opportunity to answer the allegations. Identities and personal information of the whistleblower and alleged wrongdoer will only be revealed to persons involved in investigations on a “need-to-know” basis only.

3. SCOPE AND APPLICATION

- 3.1. This Policy applies to all individuals working for the Group at all levels and grades.
- 3.2. This includes Directors, C-suite executive, managers, employees and all individual working at all levels and grades (collectively the “Employees”) and any business partners associated with us. The term ‘employee’ includes any person who is employed full time, on probation, contractually or temporarily by the Group .
- 3.3. In this Policy, the associated business partners shall refer to any individual or organization that an associate may come into contact during the course of his/her engagement with the Group, which may include but not limited to suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials.

4. ASSURANCE AND CONFIDENTIALITY

- 4.1. The Board are committed to this policy. If employees raise a genuine concern under this policy, they will not be at risk of any form of retaliation, including but not limited to, losing their job or suffering any form of victimization. Provided they are acting in good faith, reasonably believe that information, and any allegations contained in it, are substantially true and they are not acting for personal gain. The Company does not extend this assurance to someone who maliciously raises a matter they know are untrue. The Company will not tolerate the harassment or victimization of anyone raising a genuine concern, however the Company recognize that an employee may nonetheless want to raise a concern in confidence under this policy. The Company will protect the identity and will not disclose it without the employee prior consent.
- 4.2. The Board shall take reasonable steps to maintain the confidentiality of the whistleblower and the contents of his/her report, unless:-
 - the whistleblower expressly agrees otherwise; or
 - otherwise required by law.

- 4.3 If the whistleblower, in good faith, reasonably believes he/she is being subjected to any retaliation from any person within the Group as a direct consequence of having made a disclosure under this Policy, he/she may consult the Identified Senior Manager in confidence. Any such retaliation shall in itself be considered a serious breach of this Policy. A retaliation by any person against the whistleblower may result in disciplinary action against that person, including issuance of formal warning or reprimand, suspension or termination of employment or service with the Group.
- 4.4 The Company reserves the right to revoke the protection accorded under this Policy if the whistleblower has, or is found to have:
- participated in the wrongdoing; and
 - made a disclosure not in accordance with the requirements of this Policy (for instance, false, dishonest, mischievous or malicious complaints).

In such an event, the Company shall give written notice to the whistleblower (if he/she is an employee) of the revocation of protection. In addition, the Company reserves the right to take such legal or other actions or disciplinary measures against the whistleblower, including issuance of formal warning or reprimand, suspension or termination of employment or services with the Group.

5. REPORTING PROCEDURES

5.1. Who can report?

Any of the following persons can make a report:

- Stakeholders of the Group, including employees employed full time, on probation, contractually or temporarily by the Group;
- People performing services for the Group, including contractors and service provider; and
- Members of the public who are natural persons, not being incorporated or unincorporated bodies.

A wrongdoing may occur in the course of the Group's business or affairs or at any workplace, i.e any related workplace to the Group's business or affairs, for example, on the Group's premises, at an event organized by the Group, or during a conference attended by the Group's employees in the course of his/her work.

If the person making the report is unsure where a particular act or omission constitutes a wrongdoing under this Policy, he/she is encouraged to seek guidance or advice from our Chairman of ARMC by sending email to whistleblowing@lpglobalbhd.com

5.2. What is Malpractice or Wrongdoing?

A report may be made that relates to malpractice or wrongdoing. Malpractice and Wrongdoing will include the following :

- Any unlawful act, whether criminal or a breach a civil law;
- Any failure to comply with appropriate professional standards;

- Fraud, blackmail, corruption or dishonesty;
- Omissions or Actions, which are likely to cause physical danger to any person, or to give, rise to a risk of significant damage to the Group's property;
- Failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income, to the Group;
- Abuse of power, or the use of powers and authority for any unauthorized purpose;
- Discrimination in the Group employment or services;
- Sexual or physical abuse of any member of employees;
- Any matters or serious breach related to actions constituting fraud;
- Any other matter, which cannot be raised through any other procedure; and
- Concealment of any or a combination of the above.

This is not a comprehensive list but is intended to illustrate the sorts of issue, which may be raised under the "Whistle Blowing policy.

5.3. This Policy excludes allegations, complaints or concerns about:

- Matters which are trivial or frivolous or malicious or vexatious in nature or motivated by personal agenda or ill will;
- Matters pending or determined through the Group's disciplinary proceedings; and
- Matters pending or determined through any tribunal or authority or court, arbitration or other similar proceedings.

5.4. When to report

5.4.1. A whistleblower should come forward as soon as possible with any information or document that he/ she, in good faith, reasonably believes and discloses a wrongdoing, which is likely to happen, is being committed or has been committed.

5.4.2. The whistleblower needs to demonstrate that he/ she has reasonable grounds for the concerns. However, he/ she is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure. If he/ she knows as a matter of fact that there are serious risks that a wrongdoing is going to take place, such genuine concerns should be raised at that early stage.

5.4.3. Disclosure by the whistleblower should be made as soon as practicable of coming upon such information or document. Delaying the disclosure may be detrimental to the whistleblower as well as any investigation and makes it harder for the Company to address and resolve the concerns.

5.5. How to Raise a Concern

5.5.1. If the employee has a concern about malpractice, first raise it with their Head of Department. If the particular employees feel unable to raise the matter to his/her Head of Department, for whatever reason, then they can raise the matter to the Senior Manager or Chief Executive. If these channels have been followed and the employee still have concerns or feel that the matter is so serious that cannot be discuss with any of the above, then they must raise it to our Chairman of ARMC by sending email to whistleblowing@lpglobalbhd.com (Collectively refer as "Identified Senior Manager")

5.5.2. To ensure clear and effective reporting of wrongdoings, the following guidelines should be adhered to as far as possible when reporting:

- A report can be made by orally, by electronic mail (“email”) or in writing under confidential cover. Prescribed form in Appendix I should be filled and forward it to the Identified Senior Manager (refer 5.5.1) confidentially;
- A disclosure should be factual rather than speculative and contain as much specific information as possible to allow for proper assessment of the nature and extent of urgency of the complaint. It shall include at least the following particulars;
 - If the whistleblower is an employee of the Group, his/ her name, designation, current address and contact numbers;
 - If the whistleblower is not an employee of the Group, his/ her name, name of employer and designation, current address and contact numbers;
 - Basis or reasons for his/ her concerns, including as many details of the wrongdoing as reasonably possible, for instance, its nature, the date, time, history of the concerns, reasons of the concerns, place of its occurrence and the identity of the alleged wrongdoer;
 - Particulars of witnesses, if any; and
 - Particulars or production of documentary evidence, if any.

6. RESPOND

- 6.1. If the concern is raised verbally, the Identified Senior Manager should put it in writing as soon as practicable to ensure that it properly reflects the concerns that have been raised. The employee must also indicate if the concern is to be treated in confidence. The Identified Senior Manager will make judgment of that confidence before disclosing it to other person.
- 6.2. The Identified Senior Manager will screen and assess the report to determine whether it is related to a wrongdoing or excluded from the scope of this Policy and will prepare general recommendations to the deciding authority (the Board or its designated officer or Committee). In cases where the report is anonymous and the Identified Senior Manager has reasonable grounds to believe that the report is made out of vexatious and frivolous allegations, the Identified Senior Manager reserves the right to reject the anonymous report. This initial process should not take more than one (1) month from the day the Identified Senior Manager receives the disclosure. It may be completed immediately if the wrongdoing is capable of causing irreparable harm to the Group.
- 6.3. The report together with the general recommendations will be referred by the Identified Senior Manager to the Board who has the authority to make final decisions including, but not limited to, any of the following:

- Rejecting the disclosure;
- Directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
- Resolution without recourse to an investigation;
- Directing investigations of the disclosure and any persons involved or implicated;
- Suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact-finding or to avoid any employee's exposure to a threat or harm;
- Delegating to a Designated Officer or any other persons from within or outside the Group to conduct any investigation or to carry out any other process pursuant to this Policy (for instance, any meeting or an internal audit);
- Obtaining any other assistance (for instance, external auditors or legal advice); and
- Referral to the police or any other appropriate enforcement authority.

6.4. Subject to any legal constraints, the relevant employees will be informed of the final outcome of any investigation. However, the Company may not be able to tell the precise action taken where this would infringe a duty of confidence owed by the Company to someone else.

7. HANDLING / DISCUSSION OF AN INVESTIGATION

7.1. No information concerning the status of an investigation will be given out. The proper response to any inquiry is: "I am not at liberty to discuss this matter."

7.2. Under no circumstances should any reference be made to "the allegation," "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.

7.3. The reporting individual should be informed of the following:

- Do not contact the suspected individual in effort to determine facts or demand restitution; and
- Do not discuss the case, facts, suspicions, or allegation with anyone unless specifically asked to do so by the Identified Senior Manager.

8. CONSEQUENCES OF WRONGDOING OR WRONGFUL REPORT

8.1. Where any person has or is found to have:

- committed a wrongdoing ;
- taken serious risk which would likely cause a wrongdoing to be committed ;
- made a report not in accordance with the requirements of this Policy (for instance, dishonest, mischievous or malicious complaints) ; or
- participated or assisted in any process pursuant to this Policy otherwise than in a good faith.

Corrective actions to be taken against that Person will be determined by the Board which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services with the Group or monetary or other forms of punishment.

9. ADMINISTRATION

The HR Senior Manager or his designate is responsible for the administration, revision, interpretation and application of this policy. The policy will be reviewed annually and revised as needed by the Board of L&P. Amendments will be notified in writing to employees when it occurred.

L&P Global Berhad

Rev 002

Company No.: 202101028085 (1428385-M)
(Incorporated in Malaysia)

Whistler Blowing Report

Part A: To be completed by individual raising a concern

1	Details of Whistleblower	
	Name : _____	
	Contact No : _____ Email : _____	
2	Issue Raised	
	Nature of Concerns	
	Background, Date & History of the Concerns	
	Identity of the Person Engaged in Improper Conduct	
	Reasons for the Concerns	
	Details of Evidence & Witnesses	
	Whether Actions has already been taken & by whom	
	Whether Whistle Blower has any personal interest in the Matter reported	
	Submitted by : Name : Date : Time :	Received by : Name : Date : Time :

Part B: To be completed by Investigator / Investigating Officer

3	Additional information	
4	Investigation of Concern / Steps taken to address the Concern	
5	Findings	
6	Recommendations	
7	Preventive Measures to be Taken	

Prepared by:
Name :
Date :
Time :