

## WHISTLEBLOWER POLICY

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Eversendai Corporation Berhad and all its subsidiaries (hereinafter referred to as Eversendai) is committed to achieving and maintaining high ethical standards with regard to behaviour at work as set out in the Anti-Bribery and Corruption Policy and the Company's Code of Conduct.

Eversendai encourages all relevant stakeholders to report genuine concerns about unethical behaviour comprising of bribery, corruption, malpractices, illegal acts or failure to comply with regulatory requirements and company code of conduct without fear of reprisal should they act in good faith when reporting such concerns.

Eversendai is strictly committed to provide the whistleblower protections as outlined under the law based on the relevant Act or Regulation of the Country of operations (e.g. Malaysia Whistleblower Protection Act 2010) and the corresponding procedures of the Company.

The following protections will be accorded to a whistleblower and witness for lifetime who makes a disclosure of improper conduct to Eversendai in good faith:

- confidentiality of identity;
- immunity from civil and criminal liability for the disclosure made; and
- protection from threats, harassments, retaliations and other forms of detrimental action.

All whistleblowers shall address their protected disclosures in writing (typed) without their identity so as to ensure a clear understanding of the issues raised to the Head of Company and the Group Managing Director in English or the local language.

Protected disclosures shall be submitted with a covering letter bearing the identity of the whistleblower to the Head of Company and the Group Managing Director who will discuss with the Board and if deemed fit shall detach the covering letter and forward the protected disclosure to the Head of Human Resource Management for investigation and report within 30 days to the Board. Protected disclosures shall be factual and not speculative or in the nature of a conclusion and shall contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.

Whistleblower must disclose his/her identity. Anonymous disclosures will not be entertained as it would not be possible to interview the whistleblower. Whistleblowers shall refer to the Guide on Types of Malpractices to ascertain before submitting a protective disclosure.

This documented Eversendai Whistleblower Policy shall be reviewed periodically for control effectiveness and continual improvement, in meeting objectives and targets, displayed appropriately and made available to all relevant stakeholders, communicated in the appropriate language and trained for their understanding, acceptance and compliance.

**APPROVED BY**



**TAN SRI A K NATHAN**  
**Group Managing Director**  
**03 April 2020**