

**CYL CORPORATION BERHAD**  
**REGISTRATION NO.: 200001013537 (516143 V)**  
(Incorporated in Malaysia)

**WHISTLEBLOWING POLICY**

**1. Introduction**

1.1 All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

1.2 This policy is designed to:

- Support the Company's value;
- Ensure employees can raise concerns without fear of reprisals; and
- Provide a transparent and confidential process for dealing with concerns.

1.3 This policy not only covers possible improprieties in matters of financial reporting, but also:

- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Endangerment of an individual's health and safety; and
- Concealment of any or a combination of the above.

**2. Principles**

2.1 The principles underpinning the policy are as follows:

- All concerns raised will be treated fairly and properly;
- The Company will not tolerate harassment or victimization of anyone raising a genuine concern;
- Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- The Company will ensure that any individual raising a concern is aware of who is handling the matter; and
- The Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this assurance to someone who maliciously raises a matter he / she knows is untrue.

### 3. Whistle-Blower Channel

- 3.1 If any employee believes reasonably and in good faith that malpractice exists in the work place, the employee should report this immediately to the line manager. However, if for any reason the employee is reluctant to do so, then the employee should report the concern via the following channels:

Name	Audit Committee	Board of Directors
Mdm Tang Sook Kuen	Chairperson	Independent Non-Executive Director
Y. Bhg. Tan Sri Abu Talib Bin Othman	Member	Non-Independent Non-Executive Director/Chairman
Mr Ong Chong Chee	Member	Independent Non-Executive Director
Ms Gan Kok Ling	Member	Independent Non-Executive Director

Any report can be submitted confidentially via email to any one of the following Audit Committee members:

Name	Email Address
Mdm Tang Sook Kuen	sktang350@gmail.com
Y. Bhg. Tan Sri Abu Talib Bin Othman	talibothman@yahoo.com
Mr Ong Chong Chee	chongchee.ong@gmail.com
Ms Gan Kok Ling	jonq8@hotmail.com

The above-mentioned persons will provide the employee counseling advice. The concerns will be reported to the Company without revealing the employee's identity.

- 3.2 Employees' identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can be preceded.

### 4. Procedures: Initiation

- 4.1 All employees are encouraged to raise genuine concerns about impropriety at the earliest opportunity, and in an appropriate way. Conduct becomes reportable when it happens or when it is reasonably likely to occur.

4.2 As a first action, a whistleblower should raise concerns using the method below:

- (i) A report should be raised with the employee's manager who will then notify the Audit Committee. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the misconduct. The manager must undertake to treat all allegations in a confidential and sensitive manner, as set out in this Policy.

The manager notified:

- has the responsibility to ensure that concerns raised are taken seriously.
- where appropriate, should investigate properly and make an objective assessment of the concern.
- has the responsibility to ensure that the action necessary to resolve a concern is taken.
- must keep the employee advised of progress.

- (ii) However, if for some reason the whistleblower does not feel comfortable to report through his or her manager, then he or she has the right to bypass the management structure and take his concerns directly to the Audit Committee.

4.3 Concerns must be raised in writing via email. The following information must be available in order for the Audit Committee to proceed with the investigation:

- (i) Background of the individual initiating the allegation:

Name, Department and Office of the employee.

- (ii) Date(s), details and reasons why the individual is concerned about the conduct:

While the individual is not expected to prove beyond doubt the truth of the allegation or provides supporting documents at the initiation stage, the individual needs to demonstrate that there are reasonable grounds for his/her concerns.

*(Refer to **Attachment 1** for sample report format)*

4.4 The individual may independently engage professional advice or guidance on how to pursue the matter before coming forth. The individual may have colleagues, friends or legal adviser present during any meetings or interview with the Audit Committee.

## 5. Procedures- Investigation & Follow-up

5.1 The Audit Committee is committed to investigate and address all cases of reported misconduct. The Audit Committee shall:

- (i) receive and filter complaints;
- (ii) determine actions to be taken;
- (iii) assign investigations;
- (iv) ensure closures and conclusion; and
- (v) report to the relevant authorities.

5.2 The Audit Committee will ensure that the individual raising a concern is notified of the person (owner) who is handling the matter.

5.3 In order to protect individuals and those accused of misconduct, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The concern raised may:

- (i) require immediate remedial action before the investigation is conducted or concluded;
- (ii) be investigated internally by management, internal audit and independent inquiry or through a disciplinary process;
- (iii) be referred to the Board of Directors for further action; and
- (iv) be referred to law enforcement for criminal investigation.

5.4 Based on the level of severity, the Audit Committee shall determine the channel for investigation and follow-up action.

<b>Severity Level</b>	<b>Channel</b>	<b>Findings to report to</b>
1	Audit Committee	Audit Committee
2	Delegated to Senior Management	Audit Committee

The members of the Senior Management for this purpose this Policy shall be:

- Managing Director
- Executive Directors

5.5 The whistleblower may seek follow-up information about an investigation of a report or any consequent action taken. Subject to legal limitation, the whistleblower will be kept informed of the final outcome of the investigation.

## **6.0 Reports to the Board of Directors**

- 6.1 The Audit Committee shall update the Board of Directors on the progress and conclusion of each investigation on a periodic basis.
- 6.2 If there are matters that require the Board's attention immediately, the Audit Committee may request the Company Secretary to arrange for an ad-hoc meeting.

**WHISTLEBLOWING REPORT**

**The Reporting Individual (if not anonymous)**

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Name: .....

Contact Number: ..... Email : .....

Company/Department : .....

Date: ..... Time: .....

**The Report**

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Parties Involved (kindly use a separate sheet if more space is required)

	Party 1	Party 2
Name		
Position		
Department		
Company		
Location		

Date/Period of Incident: .....

Means of Discover: .....

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Other Witness/Source: .....

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Evidence/Reference Documents:

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**WHISTLEBLOWING REPORT**

Details of the Report:

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Impact to CYL Group :

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***Report received by***

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Name: .....

Date: .....

Time: .....