

JATI TINGGI GROUP BERHAD

Whistleblowing Policy

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1. OVERVIEW

JATI TINGGI GROUP BERHAD (referred hereinafter as “the Company” or “Jati”) and its subsidiary(ies) (“the Group” or “Jati Group”) is committed to achieving and maintaining the highest standard of integrity, transparency, accountability and work ethics in the conduct of its business and operations. The Whistleblowing Policy (“the Policy”) has been established to enable employees and associates within Jati Group to report any genuine concerns about gross misconduct, wrongdoings, corruption and instances of fraud, human rights violation and/or abuse that they encounter involving the interests of the Company (“Protected Disclosures”).

This Policy is to provide an avenue for all employees and associates of Jati Group (“the Whistle-Blower”) to disclose any concerns about misconduct, wrongdoings, corruption and instances of fraud, and/or in accordance with the procedures as provided under this Policy and to provide protection for its employees and associates who report such allegations. Nothing in this Policy shall interfere with other established operational policies and processes.

2. SCOPE

The purpose and objectives of this Policy are to facilitate the making of the Protected Disclosures as early as possible and in a responsible manner. As guidance, the types of improper activities covered under the Policy include, but are not limited to, the following examples:

- irregular accounting methods, financial reporting practices or auditing conduct;
- unusual or dubious payments or arrangements;
- violations of Whistleblower Protection Act 2010;
- any other activity that may violate federal, state or local laws or regulations or is otherwise unlawful;
- violations of the rules and regulations of the principal market or transaction reporting system on which the Company’s securities are traded or quoted (at the time of the adoption of the Policy);
- substantial and specific danger to the health and safety of directors, officers or employees of the Group or the general public; and
- other activities not in line with the Group’s Code of Business Conduct & Ethics Policy or any of the Company/Group’s other policies.

3. PROTECTION OF WHISTLE-BLOWER

- 3.1 No unfair treatment will be meted out to a Whistle-Blower by virtue of his/her having submitted a Protected Disclosure under this Policy. The Whistle-Blower shall be protected against reprisals or retaliation from the Management of the Company, and shall be granted immunity from any disciplinary action by the Whistle-Blower's immediate supervisor or Head of Department or any other person exercising power or authority over the Whistle-Blower in his/her employment.

The identity of the Whistle-Blower shall be kept confidential to the extent possible unless otherwise required by law or for purposes of any proceedings by or against Jati Group. Whistle-Blower are cautioned that their identities may become known for reasons outside of the control of the Company. The identity and personal information of the Whistle-Blower as well as the person implicated in the Protected Disclosure may be revealed to persons involved in investigations or any other processes that are deemed necessary to assist investigations. Any other employee or person assisting in the said investigation shall also be protected to the same extent as the whistle-blower.

- 3.2 The protection will be accorded by Jati Group only when the Whistle-Blower satisfies all the following conditions:
- a) the Protected Disclosure is made in good faith, does not contain any false or misleading information which was provided, knowingly, negligently or recklessly and is not made out of ill will or with malicious intention;
 - b) Whistle-Blower has reasonable grounds and factual evidence when reporting a wrongdoing; and
 - c) the Whistle-Blower has NOT communicated the Protected Disclosure to any other party outside the established reporting channels.
- 3.3 Any attempt to retaliate, victimise or intimidate the Whistle Blower who made a report in good faith is a serious violation of the Company's Code of Conduct and Ethics and shall be dealt with accordingly. A Whistle Blower's right to protection from retaliation does not extend to immunity for any complicity in such matter which is the subject of the allegation or an ensuing investigation.

4. ANONYMOUS WHISTLE-BLOWER

Any anonymous disclosure will not be entertained. Any employee or associates who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate any anonymous disclosure.

5. PROCEDURES

5.1 Process for Disclosure

All Protected Disclosures may be made through ANY of the following reporting channels, in a strictly confidential manner:-

- i) By email to whistleblowing@jatitinggi.com; or
- ii) In-writing, enclosed in a sealed labelled envelope stating “*To be opened by the Chairman of the Board or Chairman/Chairperson of the Audit and Risk Management Committee only*” to the following address :-

**Unit 521, 5th Floor, Lobby 6
Block A, Damansara Intan
No. 1, Jalan SS20/27
47400 Petaling Jaya
Selangor Darul Ehsan**

5.2 Investigation Process

- a) The action taken by the Group in response to any Protected Disclosure raised under this Policy will depend on the nature of the concern highlighted.
- b) The Audit and Risk Management Committee shall assign/appoint an investigator (“Investigator”), either the Internal Auditor or an independent investigator. The Investigator must be impartial and independent of all parties concerned.
- c) The Investigator is required to report the status of all pending and on-going investigations, as well as any actions taken or to be taken in relation to such investigations, to the Audit and Risk Management Committee.
- d) Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some Protected Disclosures may be resolved without the need for investigation.

- e) If an investigation leads the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency/regulatory body.
- f) If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may violate the Group's policies, the findings shall be reported to the Managing Director or the Head of Human Resource, in accordance with the applicable procedures for Group conduct and the disciplinary administration.
- g) Any charges of misconduct arising from an investigation conducted under this Policy shall be handled in accordance with the established disciplinary procedures.

5.3 Record of Complaints and Investigations

The Head of Human Resource will maintain a log of all Complaints, tracking the receipt, investigation and resolution thereof. All disclosures along with the results of the investigation relating thereto shall be retained by the Company for a minimum period of 7 years.

6. REVIEW

This Policy shall be reviewed by the ARMC periodically or at least once in every three (3) years to ensure it complies with the requirements of the relevant legislation, and remains effective for the Group. Where necessary, changes to the Policy will be made, subject to the approval of the Group's Board of Directors upon recommendation from ARMC.