



HCK CAPITAL GROUP BERHAD (484964-H)

WHISTLE-BLOWING POLICY

1. INTRODUCTION

- 1.1 The Group expects the highest standards of integrity from all its employees and vendors. It takes a serious view of any wrongdoing on the part of any of its employees, management, directors and vendors, in particular with respect to their obligations to the Group's interests.
- 1.2 The issues raised are usually not of a type discoverable by audit, but relate instead to personnel and business malpractices or misconducts.
- 1.3 The whistle-blowing channels are established to provide the stakeholders an avenue to voice their concerns without fear of retaliation, on any wrongdoing that they may observe in the Group.
- 1.4 All employees and vendors 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.
- 1.5 This in turn will help to promote transparency and accountability throughout the Group.

2. PURPOSE AND SCOPE OF THE POLICY

2.1 This policy is designed to:

- support the company's values;
- ensure employees can raise concerns without fear of reprisals; and
- provide a transparent and confidential process for dealing with concerns.

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

- fraud;
- misappropriation of assets;
- criminal breach of trust;
- corruption, bribery or blackmail;
- criminal offences;

- failure to comply with a legal or regulatory obligation;
- misuse of confidential information;
- endangerment of an individual's health and safety;
- acts or omissions which are deemed to be against the interest of the Group; and
- concealment of any or a combination of the above.

3. PRINCIPLES

3.1 The Company expects all parties to act in good faith and have reasonable grounds when reporting a whistle-blowing complaint.

3.2 The principles underpinning the policy are as follows:

- only genuine concerns will be reported;
- all reports should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain;
- all concerns raised will be treated fairly and properly;
- the Company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- any individual making a disclosure will retain anonymity unless the individual agrees otherwise; 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.

3.3 Malicious and false allegations will be viewed seriously and treated as a gross misconduct, and if proven may be subject to appropriate action, up to and including dismissal or legal action, where applicable.

4. PROCEDURE FOR REPORTING

4.1 If any employee believes reasonably and in good faith that malpractice exists in the work place, the employee should report this immediately to his/her immediate superior or manager.

4.2 If for any reason, it is believed that this is considered inappropriate, then the concerns should be raised with his/her senior manager.

4.3 However, if for any reason the employee or party concerned is reluctant to do so, then he/she should report the concerns to the Audit Committee Chairman.

4.4 The party concerned could either email, fax or submit his/her complaints via letter.

4.5 Party who raises his/her concerns or submits the complaints via email, faxes or letters, should disclose his/her name, contact number, details of person(s) involved, nature of allegation, when and where the incident took place and provide evidence, if possible.

4.6 All reports will be treated as confidential.

4.7 All reports will be investigated promptly. An investigation may include internal reviews,

reviews by the external auditors or lawyers or some other external body, if necessary.

4.8 Once the investigation is completed, the appropriate company representative will inform the whistleblower of the results of the investigation as well as any corrective steps that are being taken, if any.

4.9 Where possible, steps will also be implemented to prevent similar situation arising.

4.10 The whistle-blowing channels are as follows:

(i) Letters to: The Audit Committee Chairman
 HCK Capital Group Berhad
 Level 40, HCK Tower,
 No. 8 Jalan Damansara, Empire City,
 PJU 8, 47820 Petaling Jaya,
 Selangor Darul Ehsan, Malaysia
 “Strictly Confidential”

(ii) Email to whistleblowing@hckcapital.com

5. CONFIDENTIALITY

5.1 The identity of parties reporting a whistle-blowing complaint will be kept confidential. However, their consent will be sought should there be a need to disclose their identity for investigation purposes. A dialogue will be carried out with the parties concerned as to whether and how the matter can be proceeded.

5.2 Employees who participate or assist in an investigation will also be protected. Every effort will be made to protect the anonymity of the whistleblower, however, there may be situations where it cannot be guaranteed.

6. DISCIPLINARY ACTION

6.1 If the claim of malpractice or misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) up to and including termination of employment or legal action, where applicable.

6.2 Any act of retaliation or victimisation against the whistleblower will result in disciplinary action, up to and including termination of employment or legal action, where applicable.

- 6.3 The malicious use of the whistle-blowing policy will result in disciplinary action against the whistleblower, up to and including termination of employment or legal action, where applicable.