

## **WHISTLEBLOWING POLICY**

### **1. INTRODUCTION**

Tuju Setia Berhad (“**Company**”) and its subsidiary (collectively referred to as the “**Group**”) are committed to achieve the highest standards of integrity, openness and accountability in the conduct of its businesses and operations. We encourage freedom of speech and strive to conduct our affairs in an ethical, responsible and transparent manner at all times.

### **2. OBJECTIVES**

The main objective of this Whistleblowing Policy (“**Policy**”) is to sets out an avenue where legitimate concerns on malpractice, unethical behaviour, misconduct, wrongdoings, corruption, bribery, fraud, misuse of the Group’s property, abuse of power, conflict of interest, non-compliance to various policies and procedures and violation of laws and regulations, can be objectively investigated and addressed. Individuals should be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

### **3. SCOPE OF THE POLICY**

This Policy applies to all Directors and employees of the Group, and external parties such as customers, suppliers, contractors, agents, consultants, outsourced personnel, distributors and advisors and other stakeholders.

This policy governs the reporting and investigation of improper or illegal activities as well as the protection offered to the whistle-blower who acts in good faith. The misconduct covers but is not limited to the following:

- i. Criminal offences or illegal activities;
- ii. Fraud;
- iii. Breaches of the Group’s policies, procedures and applicable law and regulations;
- iv. Corruption and bribery;
- v. Conflict of interest;
- vi. Improper conduct or immoral act;
- vii. Unauthorised use or misuse of the Group’s properties and confidential information;
- viii. Abuse of power or use of power and authority for unauthorised purpose;
- ix. Insider trading; and/or
- x. Other acts of wrongdoing.

#### **4. ACTING IN GOOD FAITH**

The Group expects all the parties to act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

#### **5. ANONYMITY AND CONFIDENTIALITY**

5.1 To prevent malicious reporting, poison letters and abuse of the reporting channel, all reporting individuals (“**Whistleblowers**”) must identify themselves and provide contact information in their reports, which will be useful for the following purposes:

- i. To enable the independent investigation panel to verify each report and obtain further information, if required;
- ii. To facilitate any further investigations by authorized Department, Internal Auditor or the authorities (where relevant), where the identity of the informer is required by law; and
- iii. To facilitate the communication of investigative findings to the Whistleblowers.

5.2 Protection will not be accorded for Whistleblower who chooses to remain anonymous.

5.3 The Group gives the assurance that it will not reveal the identity of the Whistleblower to any third party not involved in the investigation or prosecution of the matter, unless otherwise required by law.

5.4 The Group will treat all the reports and information provided as sensitive and confidential. The Group’s assurance of confidentiality can only be completely effective if the Whistleblower likewise maintains confidentiality.

#### **6. ASSURANCE AGAINST REPRISAL AND/OR RETALIATION**

Whistleblowers are protected against being dismissed or penalised by the Group as a consequence of his/her disclosure. The Group will not tolerate such detrimental treatment when concerns are raised in good faith. Such protection is accorded even if the investigation later reveals that the Whistleblower is mistaken as to the facts. It is to be noted that any person who has not acted in good faith shall not be entitled to any protection under this Policy. If allegations are proven to be malicious or founded on bad faith, parties responsible may be subject to appropriate action, including but not limited to legal action, where applicable.

#### **7. WHISTLEBLOWING CHANNEL**

Any malpractice and misconduct that is discovered or genuinely suspected by the Whistleblower shall be reported immediately to the immediate superior. Any concern that deemed inappropriate to be reported to the immediate superior who is involved in the wrongdoings should be raised to the attention of the Group Managing Director, Group Executive Director, or Audit Committee Chairman.

The report can be made in the following manner:

- i. Fill up the whistleblowing form (“**Form**”) that provided in the Appendix of this document. Complete this Form in writing addressed and forwarded in a sealed envelope to the designated person to the following address: -

Attention: **Chairman of the Board / Chairman of Audit Committee**  
Tuju Setia Berhad  
No G-31, Jalan Puteri 4/8, Bandar Puteri,  
47100 Puchong, Selangor Darul Ehsan

- ii. Emailing the Form to the Chairman of the Board and/or Audit Committee at [whistleblowing@tujusetia.my](mailto:whistleblowing@tujusetia.my)

## **8. PROCEDURE FOR HANDLING WHISTLEBLOWING REPORT**

- 8.1 An investigation will then be carried out by authorised personnel who is/are independent from the reported incident to ensure an objective and independent investigation process;
- 8.2 Following the investigation, the Whistleblower shall be accorded with privilege to be notified on the outcome, in a way that is permissible under confidentiality consideration;
- 8.3 Upon completion of the investigation, an appropriate course of action will be recommended to the Audit Committee for their deliberation. The Audit Committee will review the investigation report and submit a summary report to the Board of Directors for their information and/or action, where applicable.

## **9. REVIEW OF THE POLICY**

This policy will be reviewed periodically to assess its effectiveness by the Board of Directors and the Audit Committee. Any revisions, amendments to this policy will be communicated to all employees of the Group and published at the Company’s website accordingly.

*(This Policy was approved and adopted by the Board on 16 December 2021)*