

## **Whistleblowing Policy**

The Company is committed to the highest standard of integrity, transparency, accountability and ethics in the conduct of its business operations.

### **Objective of the Policy**

1. Provide an avenue for all employees and member of the public to disclose any improper conduct or any action that is or could be harmful to the reputation of the Company and/or compromise the interest of stakeholders.
2. Provide proper internal reporting channel to make a disclosure to disclose any improper or unlawful conduct in accordance with the procedures as provided for under this policy in a timely manner.
3. Provide protection for the whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such person's confidentiality.
4. Treat both the whistleblower and the alleged wrongdoer fairly.

### **Scope of the Policy**

1. Fraud
2. Bribery
3. Abuse and/or misuse of Power
4. Conflict of Interest
5. Theft or embezzlement

The above list is not exhaustive and includes any act or omission, which if proven, will constitute an act of misconduct, business ethics or offence under relevant laws in force.

### **Process and procedure**

Disclosure can be submitted via [whistleblowing@naimindah.com](mailto:whistleblowing@naimindah.com).

The whistleblower shall disclose his/her name and contact details. Also to disclose the details of the allegation person(s) involved, time and place where the incident took place and the supporting evidence, if any.

Identity of the whistleblower will be treated as high confidentiality to the extent reasonably practicable. The whistleblower will also be protected against any unfair practice, such as but not limited to, retaliation, threat or intimidation of termination of service, disciplinary action, demotion, refusal of promotion or rights to continue to perform duties.

The email received in [whistleblowing@naimindah.com](mailto:whistleblowing@naimindah.com) will be channelled to the Chairman of Board of Directors, Chairman of Audit Committee and Managing Director/ Group CEO. They shall convene a meeting to discuss the issue within three (3) working days upon receipt of the whistleblowing email and to take appropriate actions, including forming of special task force, to investigate the issue highlighted.

An appropriate person will be tasked to update and /or notify the whistleblower the status and/or outcome of the issue raised.

### **Notification**

The whistleblower will be notified of the status and/ or outcome of the investigation from time to time and/ or upon completion of the whistleblowing process and procedure.

END