



**HO HUP CONSTRUCTION
COMPANY BERHAD**

(14034-W)

WHISTLEBLOWING POLICY

01 SEPTEMBER 2022

TABLE OF CONTENTS

1.	INTRODUCTION	1
2.	OBJECTIVE AND SCOPE	1
3.	POLICY AND PROTECTION.....	3
4.	PROCEDURES	4
5.	APPENDIX 1 – REPORT OF WRONGDOINGS	6

HO HUP CONSTRUCTION COMPANY BERHAD WHISTLEBLOWING POLICY

1.0 Introduction

In line with good corporate governance practices and with the introduction of the Whistle-blower Protection Act 2010, the Board of Ho Hup Construction Company Berhad (Ho Hup and/or the Company) and its group of companies (the Group) encourage its employees and stakeholders to report any wrongdoing on the part of employees, management, Directors and vendors in particular with respect of their obligation to the Group's interests.

2.0 Objectives and Scope

- 2.1** The Whistle-blowing Policy (Policy) affords an avenue to provide and facilitate a mechanism for any Whistle-blower to report concerns about suspected and/or known wrongdoing including but not limited to the following:
- incidents of fraud, corruption or bribery;
 - conduct or activity which breaches any law or regulatory obligation;
 - breach of Group's policies, practices, procedures or other rules of conduct;
 - improprieties in matters of financial reporting; and
 - situation which pose danger to health, safety or any individual or significant danger to environment
 - inadequacies in an organisation's anti-corruption programme.
- 2.2** The above suspected and/or known wrongdoings are not exhaustive and include any other act or omission, which if proven, will constitute an act of misconduct pursuant to any criminal offence under the relevant law in force.
- 2.3** The Policy also provides protection for any Whistle-blower who makes such disclosures or reports such allegations.
- 2.4** The Policy reflects Malaysian law and shall apply to the Group.
- 2.5** All confidential reporting or disclosures by a Whistle-blower are to be directed to the designated person in accordance with the procedures under this Policy.
- 2.6** The procedures outlined in this Policy are not intended to invalidate Ho Hup's grievance procedures and/or disciplinary action processes and procedures and are therefore subject to the procedures and restrictions in force.
- 2.7** The Company reserves the right to amend the policy from time to time.

3.0 Policy and Protection

3.1 Anonymity

The Company recognized that anonymity to any individual/employee (whistle-blower) who willingly come forward to report a suspicion of misconduct is key to encouraging such reporting. However, to prevent

false and malicious reporting, poison letters and abuse of the reporting channel, all whistleblowers must provide sufficient evidence (such as documents, audio, images, text message, email etc.) in their report to facilitate further investigation.

3.2 Assurance against reprisal and/or retaliation

Where the Whistle-blower has chosen to reveal his/her identity, it is the policy of the Company to provide assurance that the Whistle-blower would be protected against reprisals and/or retaliation from his/her immediate superior or head of department / division.

In addition, the Company provides assurance that no disciplinary action can be taken against the Whistle-blower as long as he/she does not act in bad faith, and/or provide false information in the report "*purposely, knowingly or recklessly*"
i.e. the report is basically *malicious* in nature.

3.3 Confidentiality

The Company shall treat all reports or disclosures as sensitive and will only reveal information on a "need to know" basis or if required by law, court or authority.

3.4 Acting in Good Faith

The Group expects the Whistle-blower to act in good faith and have reasonable grounds when reporting a wrongdoing. If allegations are proven to be malicious, the Whistle-blower may be subject to appropriate action, up to and including legal action, where applicable.

4.0 Whistleblowing Procedure

4.1 Any person who has knowledge or is aware of any improper conduct within the Group is encouraged to make such disclosure in accordance with the procedures stated herein.

A. In the case of Ho Hup employees, any concern should be raised with his/her immediate superior, and in the case of Ho Hup stakeholders, any concern should be raised with the immediate superior of the employee concerned or to the Compliance Officer.

Name : Yee Lai Kuan
Via Email : ireneyee@hohupgroup.com.my
Via Mail : Marked "Strictly Confidential"
Address : Ho Hup Construction Company Berhad,
Level 18, Ho Hup Tower, Persiaran Jalil 1,
Bandar Bukit Jalil, 57000 Kuala Lumpur.

- B.** If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Chairman of Ho Hup. The channel of reporting to the Chairman of Ho Hup is as follows:

Name : DIG Tan Sri Mazlan Bin Lazim
Via Email : mazlanpdrm61@gmail.com
Via Mail : Marked "Strictly Confidential"
Address : Ho Hup Construction Company Berhad,
Level 18, Ho Hup Tower, Persiaran Jalil 1,
Bandar Bukit Jalil, 57000 Kuala Lumpur.

- 4.2** The Whistle-blower is encouraged to use the "Report of Wrongdoings" form provided in Appendix 1.
- 4.3** The Whistle-blower will be notified on the outcome of the disclosure after investigation, within 30 days, or at the discretion of the Company.

Appendix I
REPORT OF WRONGDOINGS

1.	Date and Time of Report	
2.	Details of Alleged Person	
	Name	
	Company	
3.	Details of incident	
	Incident date and time	
	Location of incident	
	<p>Details of allegation and information required to facilitate investigation including:</p> <p>Nature of improper conduct; Identity of alleged wrongdoer; Particulars of witnesses, if any; Particulars or production of documentary evidence and Other details deemed useful to facilitate screening and action to be carried out</p> <p>Note: Anonymous complaints will not be entertained and covered under the policy</p>	
4.	Details of Reporting Party	
	Name:	
	Contact number:	
	Email address:	
	Company:	
	Signature:	