

# Whistleblowing Policy

- WAYS TO REPORT WHAT SHOULD BE REPORTED -

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## POLICY STATEMENT

Kulim is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

This Policy covers all matters involving Kulim's Group of employees and any other person providing services and/or with a business relationship with Kulim.

This Policy aims to:

- Encourage stakeholders to feel confident in raising serious concerns and to question and act upon concerns.
- Provide avenues to raise those concerns and receive feedback on any action taken.
- Ensure that whistleblower receive a response and aware of how to pursue if they are not satisfied.
- Reassure that whistleblower will be protected from possible retaliations.

## IMPROPER CONDUCT

Parties can report a whistleblowing complaint if they are aware of any wrongdoing, including, but not limited to the following:

- fraud
- misappropriation of assets
- sexual harassment
- criminal breach of trust
- corruption
- questionable or improper accounting
- misuse of confidential information
- breach of Group Policies and Authorities
- any action which creates risk (actual or potential) to the health and safety of any individual
- actions or omissions which are considered to be against the interest of the Kulim Group

Whistleblower may choose to remain anonymous. However, they are encouraged to disclose their identity in making any report under this Policy, especially if further investigation is required. Please take note that investigation may be hinder if they maintain the anonymity.

## ACTING IN GOOD FAITH

Kulim expects all parties to act in good faith and have reasonable grounds when reporting a whistleblowing complaint. Kulim reserves the right to take disciplinary action against those who:

- intentionally disclose any matter through the whistleblowing mechanism under this Policy, knowing the matter to be false; or
- make reports with the intention to deceive or misinform.

## WHISTLEBLOWING CHANNELS

Any wrongdoing or improper conduct that is discovered or genuinely suspected shall be reported immediately to:

- 1) Any concern should be raised immediately to the Executive Director of Kulim at the following address:

**Name** : Tn. Hj. Zulkifly Zakariah  
**E-mail** : [zeck@kulim.com.my](mailto:zeck@kulim.com.my)  
**Tel No** : +607 – 8611611

**Mail** : Mark as “Strictly Confidential”  
K.B. 705 Ulu Tiram Estate  
80990 Johor Bahru  
Johor

**Attention** : Executive Director of Kulim (M) Berhad

- 2) If for any reason, it is believed that this is not possible or appropriate, then the report should be made to the Chairman of Kulim at the following address:

**Name** : YB Dato’ Kamaruzzaman Abu Kassim  
**E-mail** : [kak@jcorp.com.my](mailto:kak@jcorp.com.my)  
**Tel No** : +607 – 2192692

**Mail** : Mark as “Strictly Confidential”  
Level 25, Menara KOMTAR Johor Bahru City Centre  
80000 Johor Bahru  
JOHOR

**Attention** : Chairman of Kulim (M) Berhad

## **PROTECTION OF THE WHISTLEBLOWER**

Any employee who discloses wrongdoing or improper conduct in good faith and in compliance with the provisions of this Policy shall be protected against any act of retaliation.

Any party that retaliates against genuine whistleblower may be subject to appropriate action, up to and including legal action, where applicable.