

Whistleblowing Policy

1. Policy Statement

Salutica Berhad (“**Company**”) along with its subsidiaries under the group (“**Group**”) are committed to the highest standards of integrity, openness and accountability in the conduct of its business and operations as well as promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

Recognising the above values, the Company provides avenue for all employees and other stakeholders of the Company to report or disclose without fear of retaliation on any improper conduct or wrongdoing within the Group.

2. Purpose

This policy is to provide employees and other stakeholders such as suppliers, customers and contractors an administrative process to report or disclose any improper conduct or wrongdoing in accordance with the procedures provide in the policy and to provide protection for employees and other stakeholders who report such allegation.

3. Scope

This policy is designed to facilitate employees and other stakeholders to disclose any improper conduct or wrongdoing through internal channel. Such improper conduct or wrongdoing includes but not limited to the followings: -

- Theft
- Fraud;
- Misappropriation of assets;
- Misuse of Company’s name;
- Criminal breach of trust;
- Illicit, bribery and corrupt practices;
- Discrimination or harassment;
- Questionable or improper accounting;
- Illegal or criminal offences;
- Conflict of interest without disclosure;
- Misuse of the Company’s properties or confidential information;
- Endangerment of employees’ or public health and safety;
- Acts or omissions which are deemed to be against the interest of the Company, laws regulations or public policies;
- Receive excessive gifts from customers / suppliers; or

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- Deliberate concealment of any of the above matters or wrongdoing.

Whenever possible, any issues should be raised and dealt with through the normal reporting lines and procedures in the Company. However, where it is believed that the malpractice cannot be resolved through the normal reporting lines and procedures, or implicates senior levels of management within Salutica, and the employee's own employment may be jeopardised by raising the concern, then the issue can be raised through the channel provided by the policy.

This policy is not to replace the grievance procedures and or disciplinary policy but to provide additional avenues for employees or other stakeholders to report or disclose without fear of retaliation on any improper conduct or wrongdoing committed or about to be committed.

4. Reporting in Good Faith

The Company expects the employees and other stakeholders to report genuine concerns in good faith and have reasonable grounds when reporting a complaint.

5. Protection to Whistleblower

A whistleblower under this policy will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistles blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct or wrongdoing committed or about to be committed.

Any party that retaliates against someone who has reported a misconduct or wrongdoing in good faith may be subjected to appropriate action, up to and including legal action, where applicable.

However, protection under this policy will not mean protection from disciplinary action arising out of false, frivolous or baseless allegation made by a whistleblower knowingly.

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6. Anonymous Whistleblower

Any whistle blower is required to disclose his or her identity to the Company in order for the Company to accord the necessary protection to such person. However, the Company reserves its right to investigate into any reports or disclosures that it receives whether anonymously or not.

7. Whistle blowing Channels

The whistleblowing channels are as follows:-

- a. Email to : Chairman, Audit Committee – whistleblowing@salutica.com.my

- b. Letter to : Chairman, Audit Committee
c/o Salutica Berhad,
3, Jalan Zarib 6,
Kawasan Perindustrian Zarib,
31500 Ipoh,
Perak.

Parties submitting the complaints should disclose their names, contact number, details of person(s) involved, nature of allegation, when and where the incident took place and provide evidence, if possible.

8. Whistleblowing Investigation Procedure

Upon receipt of the whistleblowing report, the Chairman of Audit Committee shall within a reasonable time, establish a Whistleblowing Investigation Team. The investigation will be conducted in a fair manner as a neutral fact-finding process and without any presumption of guilt.

If the Whistleblowing Investigation Team finds that the alleged wrongdoing or misconduct is true, the Whistleblowing Investigation Team shall decide on the appropriate course of action to be taken, which may be any of the following:-

- Disciplinary action
- Transfer to another department/relocation of place of employment
- Termination or suspension of employment
- Report to the relevant authorities (if applicable)

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The Whistleblowing Investigation Team may also establish and implement procedures or take preventive measures to minimize or prevent the occurrence of the wrongdoing or misconduct in the future.

The whistleblower (whose identity was disclosed) will be notified on the outcome of the investigation.

The Chairman of Audit Committee or the Investigation Team are not obliged to contact the persons who had submitted the whistleblowing report anonymously, exclude contact details or do not report in good faith. They will keep a record of all steps taken in response to each whistleblowing report received as well as how the concerns raised were resolved.

The Company reserves the right to amend this policy from time to time.