

TEO SENG CAPITAL BERHAD

(Registration No. 200601013011 (732762-T))

Whistleblowing Policy

1. Purpose

It's always the desire and aim of the Teo Seng Capital Berhad ("the Company") and its subsidiary companies ("the Group") to develop, promote and maintain high standards of corporate governance within the Group. Whistle-blowing is therefore become a key essential element of an ethical organisation and in relation to the employee as well as external parties. The Group does not tolerate any corporate impropriety, malpractice or wrongdoing by staff in the course of their work.

Employees might often be the first to realise that there may be irregularities within a Company. However, there is often a 'don't tell' or 'mind your own business' mentality deeply rooted that may indirectly cause whistleblowers to be shunned and viewed as outcasts. In such circumstances, employees or external parties may feel that it is better choosing to be ignored or silent and even shunned rather than bring to the attention of the management. Similarly, external parties are believed that response in the same manner due to the uneasiness of being tattle-tales that might damage the relationship and hostility or worst yet, retribution.

Thus, this Whistleblowing Policy ("this Policy") is to establish a framework and channel for whistleblowers from any unfair treatment as a result of their report and provides independent investigations of such matters and appropriate follow up actions

2. Scope

- a) This Policy applies to all the employees in the Group.
- b) This Policy is also applying to all external parties which includes customers, supplier, vendors, contractors and other stakeholders who may have business relation with the Group.

3. Definitions

- a) Whistleblowing: activities involving an employee/stakeholder disclose illegal, immoral, or illegitimate organisational activities to the parties that they believed to be able to stop it.

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- b) Whistleblower: is a person who expose wrongdoing of any kind of information or activity that is deemed unethical, or immoral to the higher authority.

4. Policy

- a) The Group requires employees and the external parties to put their name to their allegation whenever possible. Any concern or irregularities raised anonymously will not be entertained as identity is required to disclose. However, they will be considered, taking into account the seriousness and credibility of the issues raised, and the likelihood of confirming the allegation from attributable sources and information provided.
- b) All concern or irregularity raised will be treated strictest confidentiality.

5. Protection of whistleblower

The Group won't tolerate with any victimization of the whistleblower, and appropriate disciplinary action will be taken.

The Group also assures that the whistleblower will be protected even if the report is proven to be unfounded, subject to it has been made in good faith.

However, the Group does not condone frivolous, mischievous or malicious allegations. Employees making such allegations will face disciplinary action in accordance with the Group's Disciplinary Procedures. The Company will not tolerate abusing this Policy for personal gains on the part of any employee.

6. Procedures

The whistleblowing case or concern should be reported via the following channel and person with all the information in details and be as specific as possible which consists of the parties involved, incident date and time, types of concern, evidence substantiating the complaint, where possible, and contact details, in case further information is required.

- Chairman of Audit Committee
- Independent Non- Executive Director

Email: bs@teoseng.com.my

Mailing address: Lot PTD 25740, Batu 4, Jalan Air Hitam, 83700 Yong Peng, Johor

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Any concern or irregularities raised internally will be forward to the person-in-charged who acted for handling the case matter as well as how they can make contact with them.

7. Action Subsequent to Report

The whistleblower will keep in the loop the progress and status of the investigation and where appropriate, the final outcome, subject to any legal or confidentiality constraints.

8. List of Complaints under Whistleblowing Policy

The list of complaints/concern includes, but is not limited to

- Forgery
- Misappropriation of funds and classified documents
- Abuse and misrepresentation of power and authority
- Failure to comply with laws and regulations
- Discrimination on the basis of gender, race, disabilities
- Harassment
- Corruption and bribery
- Theft
- Any act of conflict of interest with suppliers, vendors or contractors
- Any other detrimental wrongdoing which nature of the wrongdoing is subject to absolute discretion of the Committee

9. Modification

The Group may modify this Policy to maintain compliance with applicable laws and regulations or accommodate organisational changes within the Group.

Reviewed and approved by Board of Directors ("BoD") on BoD Meeting as at 17 April 2020.