



**Astramina Group Berhad**  
Company No: 201901002673 (1311999-P)

**Whistleblowing Policy**

**Effective From: 1 June 2020**

**Version 1**

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**1. PURPOSE**

The Whistleblowing Policy (“Policy”) sets out the mechanism and framework by associates and any other individuals or organizations who have dealings with Astramina Group Berhad (“Company”) and the subsidiaries (“Group”) can confidently voice concerns / complaints in a responsible manner without fear of discriminatory treatment.

**2. SCOPE**

This Policy applies to the COMPANY. All employees (whether permanent, contract, part time or casual), Directors, Shareholders, Consultants, Vendors, Contractors, external agencies or any parties with a business relationship with the Group is encouraged to report genuine concerns in relation to breach of a legal obligation, miscarriage of justice, danger to health, safety and environment and to cover up of any of these in the workplace.

**3. DEFINITIONS**

- a) Whistleblowing – This occurs when an employee / other stakeholder raises a genuine concern about a dangerous or illegal activity or improper conduct that he / she is aware of through his / her work / dealing.
- b) Whistleblower – The employee / other stakeholder who discloses or reports the wrongdoing.

**4. POLICY**

- a) The Policy serves as a tool in preventing misconduct at the ‘get-go’ stage.
- b) The Group encourages the employees / other stakeholders to make any disclosures openly and honestly and that concerns / complaints raised will be treated fairly and properly.
- c) All disclosures made under this Policy will be dealt with in a confidential manner. Disclosures received under anonymity will not be entertained to prevent invalid malicious reporting, poison letters, exploitation and victimization.
- d) The Whistleblower is required to identify himself / herself and provide contact information in his / her report. This will facilitate the investigator to obtain further information, if required and communicate on results of investigation to the Whistleblower.

## **5. IMPROPER CONDUCT**

The following shall constitute “Improper Conduct” under this Policy:

- Incidents of fraud, corruption or bribery;
- Conduct or activity which breaches any law or regulatory obligation;
- Breach of the Group’s policies, practices, procedures or other rules of conduct;
- Unsafe work practices or substantial wasting of the Group’s resources;
- Improprieties in matters of financial reporting;
- Situation which pose a danger to health, lives or safety of the employees or the public or significant danger to the environment; and
- Concealment of any of the above.

## **6. COMMUNICATION CHANNEL**

a) Disclosure of information should initially and promptly be made by the Whistleblower to one or more of the following persons within the Group:

- Dato’ Foo Chi Ching  
(Managing Director)
- Board of Directors, Astramina Group Berhad

b) Report or disclosure under this Policy can be made through email **foo@astramina.com** or mail (using the attached form as per Appendix 1) addressed to the above persons. The detail is as follows:

Mailing Address: Astramina Group Berhad  
No. 102, Jalan Metro Perdana Barat 13,  
Sri Edaran Industrial Park,  
Off Jalan Kepong  
52100 Kuala Lumpur  
(Attention: Managing Director)

c) Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

## **7. REQUIRED EVIDENCE**

- a) The Whistleblower should be able to provide the disclosure in writing, information regarding the type of activity or conduct, identity of the person(s) suspected as being involved, when it occurred and who was affected.
- b) The Whistleblower must have first-hand knowledge or information of the facts, i.e. information obtained from third party or 'hearsay' will not be entertained. However, the Whistleblower should not be discouraged from making a report because they are unsure whether there is sufficient evidence to support their allegations.

## **8. CONFIDENTIALITY & PROTECTION**

- a) A Whistleblower must identify himself / herself when submitting a complaint / disclosure. Upon making the disclosure in good faith:
  - The Whistleblower will be protected from any reprisal within the Group or as a direct consequence of the disclosure. ('Reprisal' means disciplinary measures, demotion, suspension or termination of employment or service);
  - Any form of retaliation against individuals who have reported a wrongdoing or who have facilitated with the investigations is a breach of the principal obligation of all staff members to uphold the highest values and integrity;
  - The Whistleblower's identity shall be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against the Group; and
  - The identity and personal information of the Whistleblower and the alleged wrongdoer may be revealed to persons involved in the investigations or any other persons.
- b) Protection under 8(a) will be accorded by the Group only when the Whistleblower satisfies all the following conditions:
  - The disclosure is done in good faith;
  - The Whistleblower is aware that the information and any allegations disclosed are true;
  - The Whistleblower has not communicated the disclosure to any other party not related to the disclosure; and
  - The disclosure made is not for personal gain or interest.
- c) The Whistleblower will be protected under the Whistleblower Protection Act 2010 ("the Act") if he or she makes a disclosure in good faith to an enforcement agency as per the Act. If a Whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimization, as a consequence Whistleblowing, he may consult or report to the enforcement agency.
- d) The Whistleblower and the alleged wrongdoer will be treated fairly. The Whistleblower will be informed of the status of his disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation).

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- e) The Company views seriously any false, malicious or defamatory allegation. This can be considered as gross misconduct where appropriate disciplinary action may be taken by the Company.
- f) Suppliers/ Vendors of the Group and members of the public who become a Whistleblower will also be protected by the Group as to his/ her/ its identity subject to satisfying all conditions in 8(b) above.

**9. PROCEDURES**

- a) All complaints / disclosures should be addressed to Managing Director / Board of Directors of the Company.
- b) They have the authority to:
  - determine the legitimacy of the disclosure; and
  - direct further action.
- c) If any of the above is suspected being involved in the improper conduct, he / she will automatically abstain from attending the meeting.

**10. REPORTING**

- a) Upon conclusion of the investigation, the Chairman or Head of Committee (or other assigned investigator) will present the outcome of the investigation to the Board of Directors of the Company.

**11. ACTION SUBSEQUENT TO REPORT**

- a) If the Board of Directors of the Company is satisfied with the outcome of the investigation, it will communicate to management to proceed with the necessary disciplinary action to be taken immediately. If the misconduct involves breach of statutory provisions, official report should be made to the relevant regulatory authorities.
- b) Where Board of Directors of the Company is of the view that the matter has not been satisfactorily resolved that resulting breach to LEAP Market Listing Requirements, he /she have to promptly report it to Bursa Malaysia Securities Berhad.

**12. REVIEW OF THIS POLICY**

The Managing Director / Board of Directors of the Company can modify this policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulation and / or accommodate organizational changes within the Group. However, the modification made shall be effective after the same is circulated to employees in writing or electronically.

**Private and Confidential**  
**Appendix 1**

**WHISTLEBLOWING FORM**

<b>WHISTLEBLOWING REPORT</b>		
To:		
Incident Date & Time	Date:	Time:
Incident Location		
Name of alleged person		
Description / Circumstances of alleged incident(Please use attachment if necessary)	<ul style="list-style-type: none"><li>• What, Who, When, Where, How, Witness</li><li>• Please provide evidence to support the claim</li></ul>	
Signature :		
Name :		
Telephone No :		
Date :		

Note: It is necessary to provide your name and contact number so that we can contact you for additional information of the reported concern