

1. POLICY STATEMENT

Ireka Corporation Berhad (“Ireka”) 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.

Recognising the above mentioned values, Ireka provides an avenue for all employees of Ireka and members of the public to disclose any improper conduct within Ireka.

2. OBJECTIVE OF THE POLICY

This Policy is to provide an avenue for all employees of Ireka and the members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

3. SCOPE OF THE POLICY

This Policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through the appropriate internal channels. Such misconduct or criminal offences include the following:

- Fraud
- Bribery
- Abuse of Power
- Conflict of Interest
- Theft or embezzlement
- Misuse of Group’s Property
- Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under Ireka’s Code of Conduct or any criminal offence under relevant legislations in force.

4. APPLICABILITY OF THE POLICY

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of Ireka and its subsidiaries. This policy also applies to members of the public, where relevant.

5. PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within Ireka, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

6. RAISING A CONCERN / DISCLOSURE CHANNEL

- i. A disclosure of improper conduct may be made in writing (via a letter or electronic e-mail to whistleblowing@Ireka.com.my)
- ii. The whistleblower must address the following aspects, while reporting any issues under this policy:
 - Clear understanding of the issue being raised.
 - The issue should be based on actual facts and not merely speculative in nature.
 - Should contain as much specific information as possible to allow proper inquiry/investigation.
 - If the whistleblower has a personal interest in the matter, he will be required to disclose this.

7. INVESTIGATION

- i. The Investigative Officer who receives the report will assess the report to determine whether it is related to a Wrongdoing or excluded from the scope of this Policy and shall make general recommendations to the Board of Directors ("BOD"). The BOD may designate any person, from the Group or external party, to conduct any investigation or to carry out any other process pursuant to this Policy (for instance, any meeting or an internal audit).
- ii. The BOD has the authority to make the final decisions including, but not limited to, any of the following:
 - Rejection of the report;
 - Directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
 - Resolution without recourse to an investigation;
 - Directing investigations on the report and any persons involved or implicated;
 - Suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact finding or to avoid any employee's exposure to threat or harm;
 - Obtaining any other assistance (for instance, external auditors or legal advice); and
 - Referral to the police or any other appropriate enforcement authority.
- iii. It is intended that the disclosures by the whistleblower will be acted upon in a timely manner.

8. ANONYMOUS WHISTLEBLOWER

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Group in order for the Group to accord the necessary protection to him. However, the Group reserves its right to investigate into any anonymous disclosure.

9. NOTIFICATION

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

Ireka reserves the right to amend this policy from time to time.