



IREKA CORPORATION BERHAD WHISTLEBLOWING POLICY

[1] INTRODUCTION

1.1 Ireka Corporation Berhad and its subsidiaries (“Group”) are committed to the highest standard of integrity, honesty and accountability in the conduct of its business and operations. The Group aspires to conduct its affairs in an ethical, responsible and transparent manner. The Group expects its employees to conduct themselves with a high standard of professionalism and ethics in the conduct of business and professional activities.

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

[2] DEFINITION OF WHISTLEBLOWING

2.1 Whistleblowing is the deliberate or voluntary act of reporting an individual or organizational malpractice, by the person who had or has access to information regarding an actual, anticipated or suspected improper, unethical or fraudulent activities or conduct within the Group.

2.2 Whistleblowing enables an individual to raise concerns within the Group. However, they may not speak up due to the fear of repercussion. By establishing this policy, the person who lodges a report (“Whistleblower”) will be protected from such outcome, subject to the conditions stated herein.

[3] OBJECTIVE

3.1 The objective of this Policy is to establish and provide an avenue for reporting improper conduct or activities mentioned above for the members of the public, all employees and the Group’s stakeholders. Such reporting shall be done in a good faith by any individual(s) who has a concern about any improper conduct or activities that may lead to a negative impact on the Group.

[4] SCOPE OF APPLICATION

4.1 This Policy facilitates all employees and any external stakeholders to disclose any improper conduct through the internal channel. Such improper conduct or criminal offences include the following:

- i. Any unlawful or illegal activities, whether criminal or otherwise
- ii. Breach of policies and/or procedures;
- iii. Abuse of Power

- iv. Corruption or bribery;
- v. Conflict of Interest;
- vi. Misuse of the Group's Property;
- vii. Abuse of position or information;
- viii. Bullying and/or harassment;
- ix. Actions which can cause physical danger or harm to another person or give rise to the risk of damage to properties or assets;
- x. Forgery or alterations of any documents belonging to the Group, clients or agents of the Group; and
- xi. Any other similar or related irregularities.

The list above is not exhaustive and includes any act that, if proven is an act of improper conduct under the Group's Code of Conduct or a criminal offence under relevant legislation.

[5] APPLICABILITY

5.1 This Policy applies to all Directors and employees of the Group. The general principles & prohibitions under this Policy shall also apply to all service providers (including consultants, advisors and agents) performing services for and on behalf of the Group and members of the public. "Employee" refers to a person who enters into a contract of service with the Group under the Employment Act 1955 and those with a fixed-term contract (i.e. 3 months) including interns/trainees.

[6] REPORTING PROCEDURES

6.1 The Group will not entertain any anonymous disclosure or report. The Whistleblower is required to identify themselves and provide contact information for the following reasons:

- i. To enable an independent investigation panel to verify each report and obtain further information; and
- ii. To facilitate any further investigations by auditors or authorities where the identity of the Whistleblower is required;
- iii. To facilitate the results of the investigation to the whistleblower

6.2 The Whistleblowing report may be made in writing (via a letter or e-mail) to **whistleblowing@ireka.com.my** or through the company's website. To facilitate an investigation of the alleged wrongdoing, where possible and applicable, the following information should be included when making a disclosure:

- i. Details of the whistleblower;
- ii. Details of the improper conduct or activities;
- iii. Details of suspected personnel involved;
- iv. Particulars of witnesses, if any;
- v. Any document, information or evidence relating to the improper conduct or activities.

[7] PROCEDURE FOR HANDLING WHISTLEBLOWING REPORTS

7.1 The Group will treat all reports and information provided as sensitive and will only reveal them on a “need to know” basis for investigation. The report will be used as a basis to open an investigation of an alleged misconduct or malpractice. Any information submitted will be assessed thoroughly by the Chair of the Internal Audit Committee.

7.2 If the matter involves a member of the Board of Directors, the report will be escalated to the Chairman of the Group. If the matter involves the Chairman of the Group, the report shall be escalated to the Senior Board of Director and Independent Directors.

7.3 If an investigation is to be carried out, the Chair of the Audit Committee may either appoint the internal auditor of the Group or an independent party (internal or external) to carry out the investigation. Reports made in good faith shall be addressed in a timely manner and without any form of reprisal regardless of the outcome of any investigation.

7.4 The Group reserves the right to refer any concerns or complaints to the appropriate external regulatory authorities. Depending on the nature of the complaint or report received, the subject of the complaint may be informed of the allegations against him/her and be provided with the opportunity to defend himself/herself against such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including dismissal.

7.5 All documents, records, memoranda, correspondences and information related to the investigation of the whistleblowing report shall be kept secured by the Chairman of the Audit Committee for future reference and to ensure confidentiality.

[8] PROTECTION OF WHISTLEBLOWER

8.1 The Group will take all reasonable steps to protect the confidentiality of the identity of a Whistleblower, (if revealed), to the extent reasonably practicable and will adhere to any statutory requirement in force.

8.2 Any employee of the Group who whistleblows will also be protected against any adverse or detrimental actions in reprisal or retaliation for disclosing any improper conduct committed or about to be committed with the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith.

8.3 Such protection will continue notwithstanding that the investigation later reveals that the Whistleblower is mistaken as to the facts, rules and/or procedures of improper conduct.

8.4 The Whistleblower remains liable for his/her conduct and is responsible to ensure that disclosure is made in good faith and free from any malicious intent. The Group does not have any jurisdiction to offer any person immunity against prosecution in the criminal jurisdiction.

8.5 The Group reserves its right to revoke the protection accorded to a Whistleblower under the following circumstances:

- i. the Whistleblower participated in the improper conduct;
- ii. the Whistleblower willfully discloses a false statement;
- iii. the disclosure is made with malicious intent;
- iv. the disclosure is frivolous or vexatious; or
- v. the disclosure is made solely or substantially made with the motive of avoiding dismissal or other disciplinary action.

[9] REVIEW OF THE POLICY

9.1 The Group's Board of Directors will monitor compliance with this policy and review this policy at least once every three (3) years to ensure that it continues to remain relevant and appropriate.

Effective date: 25th August 2022