

**YLI HOLDINGS  
BERHAD1995038047  
(367249-A)**

## **WHISTLEBLOWING POLICY**

### **1.0 Purpose**

This policy establishes the position of YLI Holdings Berhad and its subsidiaries (hereinafter referred to as “YLI Group”) in encouraging employees and/or stakeholders to raise concerns in confidence, disclose any fraud, corruption/bribery/blackmail, criminal offences, failure to comply with a legal or regulatory obligation, miscarriage of justice or endangerment of an individual’s health and safety of which they become aware, and to ensure that the employee and/or stakeholder who reports allegations of such concerns will be protected from possible reprisals or retaliations if he/she has a reasonable belief that the disclosure was made in good faith.

### **2.0 Definitions**

- 2.1 Whistleblowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about any fraud, corruption/bribery/blackmail, criminal offences, failure to comply with a legal or regulatory obligation, miscarriage of justice or endangerment of an individual’s health and safety that is taking place / has taken place / may take place in the future.
- 2.3 Only genuine concerns should be reported under Whistleblowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations by the whistle blower will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal or termination of the whistle blower who abuses this policy.

### **3.0 Policy Statement**

It is the policy of YLI Group:

- 3.1 That YLI Group is committed to achieving and maintaining high standards with regards to behavior at work.
- 3.2 That all YLI Group employees and stakeholders (i.e. shareholders / suppliers / customers / partners or business associates) are encouraged to report promptly genuine concerns about any fraud, misappropriation of funds/assets, corruption/bribery/blackmail, sexual harassment/assault, criminal offences, failure to comply with a legal or regulatory obligation, miscarriage of justice or endangerment of an individual’s health and safety without fear of reprisal should they act in good faith when reporting such concern.
- 3.3 That YLI Group views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal or termination of the person/ parties harassing or retaliating in any form or manner against genuine whistle blower.

- 3.4 That YLI Group assures individual employee and stakeholder who raises issues of concern that he/she will be protected from any adverse impact on their employment or relationship with the YLI Group as a result of his/her reporting, provided the report is made in good faith and without malice.

The YLI Group respects and protects the confidentiality of the Whistleblower; and hereby gives the assurance that it will not reveal the identity of the Whistleblower to any third party or other employees and anyone not involved in the investigation or prosecution of the matter unless he or she agrees otherwise. Where concern cannot be resolved without revealing the identity of the employee raising the concern (i.e., if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can proceed. The only exception to this assurance relates to any overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistleblowing report if ordered to do so by a court of law.

#### 4.0 Procedures

- A. In the case of YLI employees, any concern should be raised with his/her immediate superior, and in the case of YLI stakeholders, any concern should be raised with the immediate superior of the employee concerned.**

If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to Chairman of YLI Holdings Berhad, and/or Managing Director of YLI Holdings Berhad.

- (i) Channel of reporting to Chairman of YLI Holdings Berhad:

Name: YBhg Dato' Samsuri Rahmat  
Via Telephone: +603 77222296  
Via Email: samsuri.rahmat@yli.com.my  
Via Mail: Mark "Strictly Confidential"

YLI Holdings Berhad  
No. 45 Lorong Rahim Kajai 13  
Taman Tun Dr Ismail  
60000 Kuala Lumpur  
Malaysia

- (ii) Channel of reporting to Managing Director of YLI Holdings Berhad:

Name: Mr Seah Heng Chin  
Via Telephone: +603 77222296  
Via Email: seah\_41@yahoo.my  
Via Mail: Mark "Strictly Confidential"

YLI Holdings Berhad  
No. 45 Lorong Rahim Kajai 13  
Taman Tun Dr Ismail  
60000 Kuala Lumpur  
Malaysia  
Attention: Managing Director

**B. In the case where reporting to management is a concern, then the reports should be made to the Chairman of Audit and Risk Management Committee (“ARMC”). Channel of reporting to the Chairman of ARMC is:**

Name: Dr Abdul Latif Bin Shaikh Mohamed

Via Telephone: +603-77222296

Via Email: [corporate@yli.com.my](mailto:corporate@yli.com.my)

Via Mail: Mark "Strictly Confidential"

YLI Holdings Berhad  
No. 45 Lorong Rahim Kajai 13  
Taman Tun Dr Ismail  
60000 Kuala Lumpur  
Malaysia

Attention: Chairman of ARMC

## **5.0 Action**

- (a) All complaints must be raised in writing and should include full details and if possible, supporting evidence, and should state that the complaints are made under the Whistleblowing Policy.

The details and information should consist:

- a) Particulars of Whistleblower;
  - b) Details of the alleged wrongdoer;
  - c) Details of incidents/allegation;
  - d) Money or assets involved;
  - e) Particulars of witness (if any); and
  - f) Supporting evidence/documentary.
- (b) All reports will be investigated promptly by the person receiving the report who should promptly report to the management, if appropriate. If required, he/she can obtain assistance from other resources within the YLI Group (e.g. Group Human Resource Department). The progress of investigation will be reported to the ARMC no later than at the next scheduled meeting.
- (c) Reports received anonymously will be treated as confidential.
- (d) The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Notwithstanding this, anonymity will be maintained as long as it is permitted by law or the person making the report indicates that he no longer wishes to remain anonymous. Requirement for reporting and disclosure to appropriate personnel or channel only.

- (e) Upon completion of investigation, appropriate course of action will be recommended to the ARMC for their deliberation. Decision taken by the ARMC will be implemented immediately.
- (f) Where possible, steps will be taken to prevent similar situation from arising again.
- (g) Investigation and Follow-up
  - a) Initial Assessment - The ARMC Chairman will assess the report received from Whistleblower and determine whether the concern raised constitutes any wrongdoings as defined in this Policy. Additional information may be requested from the Whistleblower. If the case is closed, the ARMC Chairman will inform the Whistleblower on the decision.
  - b) Investigation – If the ARMC Chairman is satisfied with the merits of the case base on an initial assessment, he/she may instruct the Group Internal Audit Department or an external independent party to carry out an investigation on the concerns raised by the Whistleblower. During the period of investigation, the accused wrongdoer may be temporary reassigned to other department/function or asked to take leave, pending the outcome of the investigation. Investigation report and accompanying recommendations shall be submitted to the ARMC Chairman and the Board of Directors to decide on any consequential action.
  - c) Communicating with Whistleblower - The ARMC Chairman shall inform the Whistleblower of the outcome of the investigation; however, the details of the findings will not be disclosed due to confidentiality.
  - a) Follow-up Actions – If the alleged wrongdoer is found to have committed the alleged misconduct, the ARMC Chairman will recommend appropriate actions to be taken against the wrongdoer, including but not limited to, employment termination or reporting the case to the police or other relevant authorities.

## 5.2 Further Action

- (a) If for any reason, the person making the report is not satisfied with the way his/her report had been dealt with, he/she can escalate his/her report to the Audit Committee. Channel of reporting to the ARMC is:

Name: Dr Abdul Latif Bin Shaikh Mohamed

Via Telephone: +603-77222296

Via Email: [corporate@yli.com.my](mailto:corporate@yli.com.my)

Via Mail: Mark "Strictly Confidential"

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No. 45 Lorong Rahim Kajai 13  
Taman Tun Dr Ismail  
60000 Kuala Lumpur  
Malaysia

Attention: Chairman of Audit and Risk Management Committee

- (b) Chairman of ARMC will deliberate the report with his Committee members and decide on the appropriate course of action.

## 6.0 Administration

The ARMC is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed once every 2 years.

Date: 30 August 2023