

ANNUM BERHAD
(fka CYMAO HOLDINGS BERHAD)
[Registration No. 199701030432 (445931-U)]
Incorporated in Malaysia

WHISTLEBLOWING POLICY

Cymao Holdings Berhad (“Cymao” or “the Company”) and its subsidiaries (“the Group”) are committed to the highest standard of integrity, transparency and work ethics in all of its operational activities and business dealings.

In line with this commitment, the Board of Directors of Cymao has adopted this Whistleblowing Policy (“Policy”) to provide an avenue for its employees and stakeholders to report genuine concerns on unethical behaviour and improper conduct within the Group without fear of retaliation.

1. OBJECTIVES

The objectives of the Policy are to:

- a. Support the Company’s values and protect the long term reputation of the Company and/or the Group;
- b. Promote and maintain high transparency, accountability and good corporate governance in the workplace;
- c. Ensure that employees can raise concerns without fear of reprisals and safeguard such person’s confidentiality;
- d. Provide a transparent and confidential process for dealing with concerns; and
- e. Maintain a healthy working culture and an efficient Group.

2. SCOPE OF REPORTING AND CONSEQUENCES OF WRONGFUL DISCLOSURE

This policy is designed to facilitate employees and stakeholders to disclose (whistleblow) any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offence include, but not limited to the following:

- Fraud, forgery, theft and embezzlement;
- Corruption, bribery and blackmail;
- Harassment, abuses and intimidation;
- Conflict of interest and potential abuse of position/power;
- Disclosure of sensitive data or information to third party;
- Misuse and/or misappropriation of the Group’s funds or assets/property;
- Serious breaches of the Company’s procedures and internal controls and the Code of Ethics and Conduct;
- Conduct or activity which breaches any law or regulatory obligation; and
- Improprieties in matters of financial reporting.

The whistleblower is responsible to ensure that the disclosure is made in good faith, accurate, factual, free from malicious intent and not made for personal gain. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.

If the investigation later reveals that the disclosure was made with dishonest, mischievous or malicious intent, appropriate action can be taken against the whistleblower, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment and where appropriate including legal action.

3. REPORTING PROCEDURES

If any employee believes reasonably and in good faith that malpractices exist in the workplace, the employee should report this immediately to:

- i. The immediate superior or head of department; or
- ii. If the matter involves the above persons, or for any reason the employee is reluctant to do so, then the employee should report the concerns to the Head of the Human Resources; or
- iii. If these channels have been followed and if employees still have unresolved concerns or if employees feel the matter is grave in nature that it cannot be discussed with any of the appointed persons above, they should contact the Chairman of the Audit Committee.

The report must be in writing and to be submitted by post or email to the Company. The report should contain the following information:

- Name of whistleblower;
- Contact number of whistleblower;
- Nature of the alleged misconduct/wrongdoings, time, location and dates of the incident took place;
- Names of person(s) involved in the allegations;
- Other witness to the misconduct/wrongdoings, if any; and
- Proof of evidence such as documents, photos, audio or video recordings, if any;

The whistleblower may choose to make anonymous reporting but the Company reserves its right to investigate or not to investigate the anonymous disclosure.

4. PROTECTION TO WHISTLEBLOWER

The identity and personal information of the whistleblower will be protected and kept confidential, unless the whistleblower agrees otherwise or unless otherwise required by law. In addition, the whistleblower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his disclosure of any improper conduct committed or about to be committed within the Group, 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 as well as the rules and procedures involved.

5. CONFIDENTIALITY

The Company shall treat all reports or disclosures as sensitive and confidential and will only reveal information on a "need to know" basis or if required by law, court or authority.

6. REVIEW

The Company reserves the right to amend this policy from time to time.

The Whistleblowing Policy is adopted on 25 November 2017.