

WELLCALL HOLDINGS BERHAD

Reg. No. 200501025213 (707346-W)

WHISTLEBLOWING POLICY

1. Policy Statement

Wellcall Holdings Berhad (“Company”) along with its subsidiaries under the group (“Group”) are committed to promote and maintaining high standards of transparency, accountability, ethics and integrity in the conduct of its businesses and operations.

Recognizing the abovementioned values, the Company provides avenue for all employees and members of the public to voice genuine concerns in a responsible and appropriate manner.

2. Objective of The Policy

This Policy is formulated to help employees and members of the public to report possible improprieties at the earliest opportunity so that concerns can be raised and protection can be provided to employees and members of the public who report such allegations.

3. Scope of Policy

This Policy applies to all employees and third parties who has become aware of or genuinely suspects on a reasonable belief that an employee of the Company has engaged, is engaged or is preparing to engage in any improper conduct or wrongdoing.

Such improper conduct or wrongdoing includes, but not limited to the followings: -

- Fraud;
- Bribery;
- Misuse of the Company’s funds or assets;
- Abuse of power;
- Conflict of interest without disclosure;
- Criminal breach of trust;
- Questionable or improper accounting;
- Illegal or criminal offences;
- Endangerment of employees’ or public health and safety;
- Acts or omissions which are deemed to be against the interest of the Company, laws regulations or public policies; or
- Deliberate concealment of any of the above matters or wrongdoing.

Whenever possible, any issues should be raised and dealt with through the normal reporting lines and procedures in the Company. However, where it is believed that the malpractice cannot be resolved through normal reporting lines and procedures, or implicates senior levels of management within the Company, and the employee’s own

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employment may be jeopardized by raising the concern, then the issue can be raised through the channel provided by the Policy.

4. Reporting in Good Faith

The Company expects the employees and members of the public to report genuine concerns in good faith and have reasonable grounds when reporting a complaint.

5. Protection to Whistleblower

The whistleblower or persons connected to him/ her shall be protected from any detrimental action as a direct consequence of the disclosure. Additionally, the whistleblower's identity and such other confidential information shall not be disclosed save with the whistleblower's consent or otherwise required by law. The protection conferred under this Policy is not affected notwithstanding that the disclosure of the improper conduct does not result in any disciplinary action on the person against whom the disclosure was made.

6. Anonymous Whistleblower

Any whistleblower is required to disclose his or her identity to the Company in order for the Company to accord the necessary protection to such person. However, the Company reserves its right to investigate into any reports or disclosure that it receives whether anonymously or not.

7. Whistleblowing Channels

The whistleblowing channels are as follows: -

- a) Letter to:
Chairman, Audit Committee
c/o Wellcall Holdings Berhad
Plot 48, Jalan Johan 2/5
Kawasan Perindustrian Pengkalan II, Fasa II
31550 Pusing, Perak DarulRidzuan
- b) Email: acchairman@wellcall.com.my
- c) The contact details of the members of the Anti-bribery & Corruption Compliance Unit (ABCCU) are as follows: -

Head of Finance/ Purchasing/Marketing/ HR Department
Contact Number: +605-366 8805
Email Address: abccu@wellcall.com.my

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Parties submitting the complaints should disclose their names, contact number, details of person(s) involved, nature of allegation, when and where the incident took place and provide evidence, if possible.

If the matter relates to one of the members of the Anti-bribery & Corruption Compliance Unit, he/ she shall abstain completely from deliberating on such matter.

8. Whistleblowing Procedure

Please refer to the flowchart of whistleblowing procedure in Appendix A.

9. Notification

Upon the completion of the investigation of the whistleblowing procedures, the whistleblower will be notified on the outcome of the investigation. The Company would like thank you in advance for bringing to our attention your concerns. Please be assured that your concerns will be investigated according to established procedures.

Date: 23rd November 2020

Revision: 1

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PPENDIX A

The whistleblowing procedure flowchart is illustrated by the following diagram: -

