



Whistleblowing Policy

1.0 Purpose

1.1 This policy is intended to provide a framework to promote responsible and secure whistleblowing without fear of adverse consequences.

2.0 Scope

2.1 Any employee or member of the public who has knowledge or aware of any improper conduct (misconduct or criminal offence) committed or about to be committed within EUROSPAN Group.

3.0 Definitions

3.1 Abbreviations used:

HR – Human Resources Department

NRIC – The National Registration Identity Card

4.0 Responsibilities

4.1

Employee/ Whistleblower	(1) To disclose his/her personal details
	(2) Responsible to ensure that the disclosure is made in good faith and free from any malicious intent
	(3) To make disclosure to reporting channels
HR	(1) Provides Whistle blowing Form
	(2) Feel free to deal with Whistleblower

5.0 Policy

5.1 In order to enable the Company to accord the Whistleblower with the necessary protection under the Policy and also to obtain more details pertaining to the disclosure, the Whistleblower is required to disclose his/her personal details as follows:-

- i. Name;
- ii. NRIC No.;
- iii. Contact Details – Office Contact/Mobile/Home

These personal details will be kept confidential.

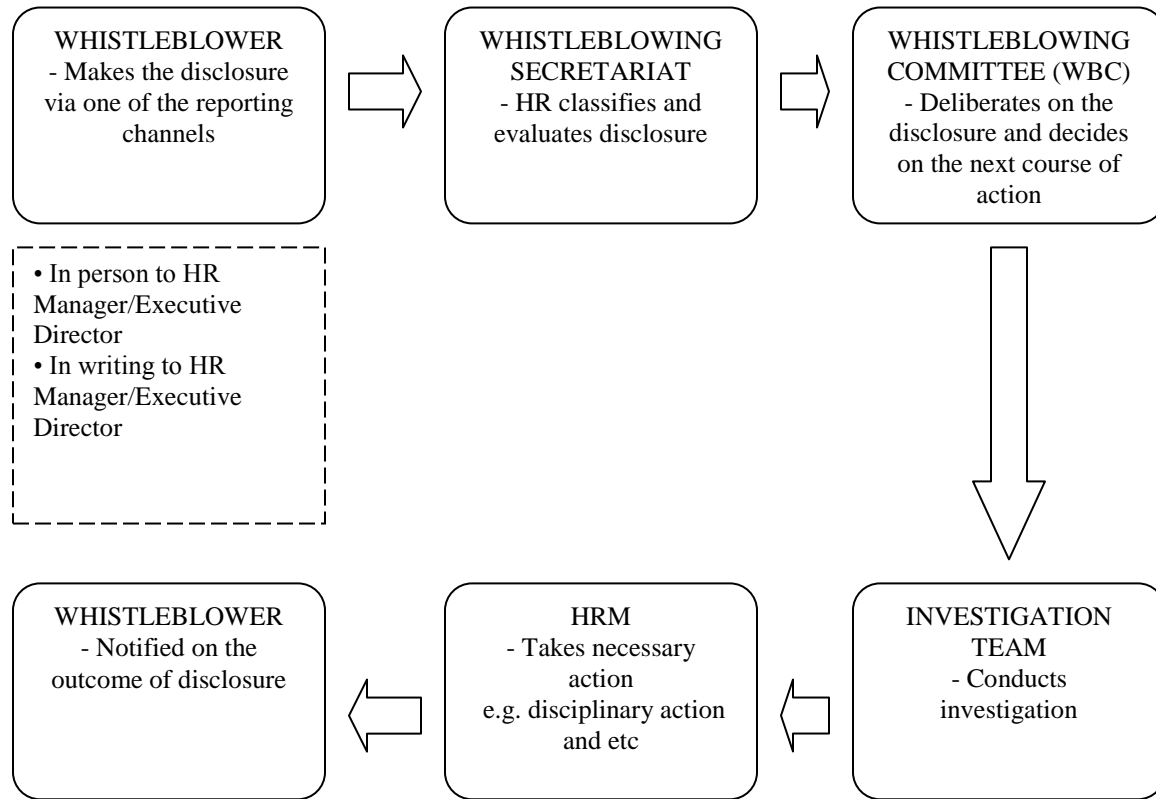
5.2 Any improper conduct (misconduct or criminal offence) including but NOT limited to the following:

- Fraud;
- Bribery;
- Abuse of Power;
- Conflict of Interest;
- Theft or embezzlement;
- Misuse of Company's Property;

- Non Compliance to Procedure.
- 5.3 Only genuine concerns should be disclosed. The Whistleblower is responsible to ensure that the disclosure is made in good faith and free from any malicious intent. In addition, any disclosure which is found to be frivolous or vexatious will not be entertained.
- 5.4 If the investigation later revealed that the disclosure was made with malicious intent, appropriate action can be taken against the Whistleblower.
- 5.5 The Whistleblower who wishes to withdraw his/her disclosure is required to write to the relevant Reporting Channel and provide reason(s) for the withdrawal. Nevertheless, the Company reserves the right to proceed with investigation on the subject matter of the disclosure.
- 5.6 Any disclosure made herein should contain the following information:
- Details of the person(s) involved;
 - Details of the allegation
 - Nature of the allegation;
 - Where and when the alleged misconduct/wrongdoing took place;
 - Other relevant information; and
 - Any supporting evidence if available.
- 5.7 A Whistleblower will be accorded with protection under the Policy 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.
- 5.8 The protection to the Whistleblower can be revoked under the following circumstances, among others:-
- the Whistleblower participated in the improper conduct;
 - the Whistleblower willfully discloses a false statement;
 - the disclosure is made with malicious intent; or
 - the disclosure is frivolous or vexatious.
- 5.9 The Whistleblower will be notified on the outcome of his/her disclosure.

6.0 Procedures

6.1 Process of making disclosure



EUROSPAN reserves the right to amend the procedures contained in this document from time to time.

7.0 Reporting Channels

7.1 Disclosures can be made to ANY of the following reporting channels, in strict confidential manner:-

- In person to HR Manager or Executive Director using the prescribed Whistle blowing Form;
- In writing to Eurospan HR Manager or Executive Director,
 - No 1168, Kampung Teluk, Sungai Dua, Kawasan Perusahaan Sungai Lokan, 13800 Butterworth, Penang; or