

Encompass Industries Policy Statement	<u>Document Title</u>	Document No.: PS-SA-11
	WHISTLEBLOWING POLICY	Revision No. : 02
		Effective Date: 01.12.2021
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1. Whistleblowing enables employees to voice concerns in a responsible and effective manner when they discover information which they believe shows serious malpractice or wrongdoing within the organisation. It is governed by the Whistleblowing Protection Act 2010 which gives legal protection to employees against being dismissed or penalised by their employers as a result of disclosing serious concerns.

2. This policy covers the following:
 - 2.1. Financial malpractice or impropriety or fraud
 - 2.2. Failure to comply with a legal or regulatory obligation
 - 2.3. Health and safety, or the environment
 - 2.4. Criminal activity
 - 2.5. Improper conduct or unethical behaviour
 - 2.6. Serious conflict of interest without disclosure
 - 2.7. Any other serious improper matters, cause financial or non-financial loss to EISB and damage the reputation
 - 2.8. Concealment of any of the above.

3. All genuine concerns raised will be treated fairly. The identity of the employee making the disclosure will be kept confidential unless he/she agrees otherwise, and as long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the process or evidence required. In this case, EISB will discuss with the whistleblower first.

4. Encompass Industries Sdn. Bhd. (EISB) ensures that no one will be at risk as a result of raising a concern, even if the employee is mistaken. However, this assurance will not be extended to someone who maliciously raises a matter that is known to be untrue.

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5. Whom to report to:

5.1. **Option One:** Report to your immediate supervisor.

5.2. **Option Two:** If the concern involves your immediate superior or for any reason you would prefer them not to be told, you may report to the following designated officer:

5.2.1. Executive Director : Stefanie Tan

Email: whistleblower@ems-inc.com

Mailbox: K-3-1, No.2 ,Jalan Solaris , Solaris Mont Kiara, Mont Kiara
50480 Kuala Lumpur

Senior management or top management personnel appointed in the capacity of whistleblower committee members.

6. Concerns or information are preferably raised in writing (letter or email). Ideally, EISB recommends any report to be detailed in setting out the background and history of events and the reasons for your concern. If you are not comfortable about writing in, you may telephone or meet the appropriate officer in confidence, at a time and location to be determined together.

7. The investigation process will be as follows:

7.1. Full details and clarifications of the complaint should be obtained.

7.2. The investigating panel should inform the employee against whom the complaint is made as soon as is practically possible. The employee will be informed of their right to be accompanied by a trade union or other representative (where applicable) at any future interview or hearing held under the provision of these procedures.

7.3. The investigating panel should consult with the Managing Director and if appropriate, consider the involvement of EISB internal auditors and/or the police at this stage.

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- 7.4. The allegations should be fully investigated by the investigating panel with the assistance where appropriate, of other individuals / bodies.
- 7.5. A finding concerning the complaint and validity of the complaint will be made by the investigating panel. This finding will be detailed in a written report containing the findings of the investigations and reasons for the finding. The report will be passed to the Managing Director.
- 7.6. The Managing Director will decide what action to take. If the complaint is found to be valid, disciplinary or other appropriate EISB procedures will be taken.
- 7.7. The complainant should be kept informed of the progress of the investigation, if appropriate, and of the final outcome.
- 7.8. If appropriate, a copy of the findings will be passed to EISB internal auditors to enable a review of the procedures.
- 7.9. If the complainant is not satisfied that their concern is being properly dealt with by the investigating panel, he/she has the right to raise it in confidence with the Managing Director.
- 7.10. The investigating panel will communicate the conclusion of all findings to the whistleblower as a matter of policy, for closure.