

Policy Title : Whistleblower Policy V2.0	Policy Ref : AYER/P&P/Other Policy
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Approved By : MANCO Meeting Ref : 2-17 dated 20 March 2017 (Item Ref No. 10.0)	

1) **Scope**

This policy applies to ALL employees of AYER Group of Companies.

2) **Objective**

- a) The Management is committed to high standards of ethical, integrity, moral and legal business conduct. In line with this commitment, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing.
- b) The primary purpose of this whistleblowing policy is to govern the reporting and handling of wrongdoing at AYER Group of Companies. This policy does not replace the Company grievances policy which will continue to be administered by the Group Human Resources Department.
- c) Wrongdoing shall mean, but not limited to, reporting of fraudulent financial information, actual or suspected fraud, misappropriation of monies, misrepresentation, conceal facts or information with intention to mislead, violation of laws and regulations, endangerment of employees or public health and safety, violation of Company's policies, taking or giving kickbacks, gratifications, bribes, favors, privileges, criminal offence and blackmailing.
- d) AYER upholds a zero tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts. All employees must not participate in any corrupt activity which are against the objective of this policy.

3) **Policy Statement And General Principles**

- a) Any member of staff who has a reasonable belief that there is serious malpractice relating to any of the issues specified under item 2 above may raise the complaint or make a disclosure.
- b) All such complaint/disclosure must be raised without malice and in good faith, and the individual must reasonably believe that the information disclosed, and any allegations contained in it, are substantially true and have sufficient evidences. The complaint/disclosure must not be made for purposes of personal gain.
- c) The Management will ensure that any staff who raises a complaint or makes a disclosure in such circumstances will not be penalized, will not suffer harassment or retaliation or suffer any adverse treatment for doing so.
- d) An employee who retaliates against someone who has reported a violation in

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good faith is subject to disciplinary action(s) up to and including termination of employment.

- e) However, a staff who does not act in good faith or makes an allegation without having reasonable grounds for believing it to be substantially true, or makes it for purposes of personal gain, or makes it maliciously or veraciously may be subject to disciplinary proceedings.
- f) In view of the confidentiality assured to the genuine complainant, the identity of the person raising the matter shall be kept confidential provided that this is compatible with a proper investigation.
- g) Anonymous complaints/disclosures may be reported, investigated or acted upon as deem fit, taking into account the seriousness of the issue raised, the credibility and evidence of the complaint, the prospects of being able to investigate the matter, and fairness to any individual mentioned in the complaint.

4. Procedures

- a) The whistleblower should promptly report the matter or instance of wrongdoing to the Chairman of Audit Committee in writing.
- b) The report must be in writing supported by any evidence to ensure that there is a clear understanding about the concerns raised. The report should be sealed in an envelope sent marked with "Private and Confidential" and addressed to or email to:

The Chairman
Audit Committee
AYER HOLDINGS BERHAD
5th Floor, Bangunan Yee Seng
15, Jalan Raja Chulan
50200 Kuala Lumpur

Email Address : raymond.yeoh@ayer.com.my

- c) The Audit Committee shall be responsible for investigating, and making appropriate written recommendations to the Board of Directors, with respect to all reported concerns.
- d) The Audit Committee shall address all reported concerns. The Chairman of the Audit Committee shall immediately notify the Audit Committee, the Strategic Oversight Committee (SOC), the Chief Risk Officer, and Group Chief Executive Officer of any such report in writing.

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- e) The Chairman of the Audit Committee will notify the sender in writing and acknowledge receipt of the report within five (5) working days. It will not be possible to acknowledge receipt of anonymously submitted reports.
- f) All reports will be promptly investigated by the Audit Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation.
- g) Action taken will include a follow-up in writing with the complainant for complete closure of the report.
- h) The Audit Committee has the authority to obtain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.