

BERMAZ AUTO BERHAD

GROUP WHISTLE-BLOWING POLICY

INTRODUCTION

1. Bermaz Auto Berhad (“BAuto” or “Company”) and its subsidiaries (“BAuto Group” or “Group”) is committed to achieving and maintaining high standards of corporate governance and professional responsibility in all its dealings in general.
2. Whistleblowers are protected under the Whistleblower Protection Act 2010.

DEFINITION

a) Whistleblower

Anyone making a Protected Disclosure under this Policy.

b) Protected Disclosure

Means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected Disclosure should be factual and not speculative in nature.

c) Group Audit Committee

Means BAuto’s Board Audit Committee

d) Preliminary Enquiry

Means the evaluation by the Administering Parties of the credibility or otherwise of facts, evidence and recording of statements provided by the Whistleblower in determining whether an investigation is good enough to proceed.

THE POLICY

3. To achieve this, the BAuto Board of Directors’ Policy on Whistleblower aims to provide all its “Employees” (including Directors) with the appropriate mechanisms to confidentially and anonymously provide information in an independent and unbiased manner, on any serious concern(s) relating to matters that may affect the professional and compliant operation of the Group’s business and its reputation, as covered in general by the Group’s Code of Conduct, on legal issues, on accounting or other related matters of good governance, to the ultimate attention of the Group’s Audit Committee.

ACTIONS BEFITTING DISCLOSURES

4. Examples of the type of matters that can and should be reported are (and the list is not exhaustive):
 - (i) a criminal offence e.g. fraudulent activities;
 - (ii) financial irregularity;
 - (iii) the giving or receiving of bribes, other illicit payments or inducements;
 - (iv) racial or sexual harassment; or
 - (v) deliberate concealment relating to any of the above.

BERMAZ AUTO BERHAD GROUP WHISTLE-BLOWING POLICY

5. The Policy will be administered by:

- (i) The Group Human Resource (HR) Department; and
- (ii) Assisted by the Risk Management & Investor Relation Department, with direct reporting to the Executive Chairman / Group CEO / Group's Audit Committee.
- (iii) In administering the Policy, the Board of Directors gives the assurance that Employees will not be at risk of any form of victimization, retribution or retaliation from their superiors or from any of its management. However, Employees must act in good faith in the provision of information. This assurance does not, however, extend to those who are found to have raised the matter under false or malicious intent. If proven as false or malicious intent or claims, the Whistleblower may be subjected to disciplinary actions by the Company.
- (iv) Any attempt to retaliate, victimize or intimidate against a Whistleblower making a report in good faith is a serious violation (of the Code) and this shall be dealt accordingly with serious disciplinary actions and procedures.

REPORTING PROCEDURE

6. The BAuto Group provides 2 methods of reporting the Whistleblower issue at hand.

Generally, the reporting process should take the following recommended route as prescribed below:

- (i) Raise the Reported Disclosure concern first with the immediate Line Manager or another Senior Manager within the Department.
- (ii) However, should the matter being reported involve directly the relevant Line Manager and / or Senior Manager, then the matter should be reported to the respective Head of Department (HOD).

If the matter concerned raised with the Department's HOD or simultaneously / subsequently to Group HR / Risk Management & Investor Relation, and feel that the issue has not been dealt with appropriately, therefore, the Whistleblower should then or also report the matter to the Group's Executive Chairman / Group Chief Executive Officer (Group CEO).

On reporting, if it is necessary to report such concern anonymously, the Whistleblower may do so. However, do bear in mind that it is generally easier to investigate and resolve issues if the Whistleblower's identity is known. Furthermore, appropriate feedback of the investigations may be shared with the Whistleblower.

Whenever possible, the Whistleblower should report the matter in writing and provide all supporting documentation. If this is not possible, oral reporting is acceptable.

- (iii) Investigation

The investigation will be concluded within a reasonable time frame commensurate with the matters disclosed in the Protected Disclosure.

BERMAZ AUTO BERHAD GROUP WHISTLE-BLOWING POLICY

If, based on the findings of the Preliminary Enquiry, the Administering Parties found that there is no basis to the allegations of wrongdoings and further found that:

- i. The Protected Disclosure by the Whistleblower is done in good faith, then a notice in writing shall be issued to the Whistleblower and the matter will be closed; or
- ii. The Protected Disclosure by the Whistleblower is NOT done in good faith, then the matter will be referred to Group Human Resource to consider whether an appropriate disciplinary action may be taken. The Whistleblower is entitled to seek redress from the Group Audit Committee.

The results of the findings or outcome will be made available and brought to the attention of the Company's Group's Audit Committee.

Appropriate feedback will be given to the Whistleblower, if his or her identity is known.

(iv) Legal Obligations

This Policy does not affect the rights or obligations of Whistleblower to report a criminal matter or other matter requiring disclosure to an external party as may be required by the Law.

7. Alternatively, the Whistleblower may refer the Protected Disclosure during normal office hours as observed by the Group to the following :

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|--------------------------------------|------------|--|
| • Executive Chairman | By mail: | No. 7 Jalan Pelukis U1/46,
Temasya Industrial Park, Seksyen U1,
40150 Shah Alam, Selangor. |
| | By e-mail: | ben@bermaz.com.my |
| | By fax: | 603- 7627 8890 |
| • Group Chief Executive Officer | By mail: | No. 7 Jalan Pelukis U1/46,
Temasya Industrial Park, Seksyen U1,
40150 Shah Alam, Selangor. |
| | By e-mail: | franlee@bermaz.com.my |
| | By fax: | 603 – 7627 3334 |
| • Independent Non-Executive Director | By mail: | No. 7 Jalan Pelukis U1/46,
Temasya Industrial Park, Seksyen U1,
40150 Shah Alam, Selangor. |
| | By e-mail: | martin@bermaz.com.my |

BERMAZ AUTO BERHAD GROUP WHISTLE-BLOWING POLICY

- Group Head, Human Resource
 - By phone: 603 – 7627 8876
 - By mail: No. 7 Jalan Pelukis U1/46,
Temasya Industrial Park, Seksyen U1,
40150 Shah Alam, Selangor.
 - By e-mail: travis.low@bermaz.com.my
 - By fax: 603 – 7627 8960

- Group Head, Risk Management & Investor Relation
 - By phone: 603 – 7627 3335
 - By mail: No. 7 Jalan Pelukis U1/46,
Temasya Industrial Park, Seksyen U1,
40150 Shah Alam, Selangor.
 - By email: tonytoh@bermaz.com.my
 - By fax: 603 7627 3334

Prepared by:-

Seconded by:-

TOH CHIN FONG
Group Head, Risk Management &
Investor Relation

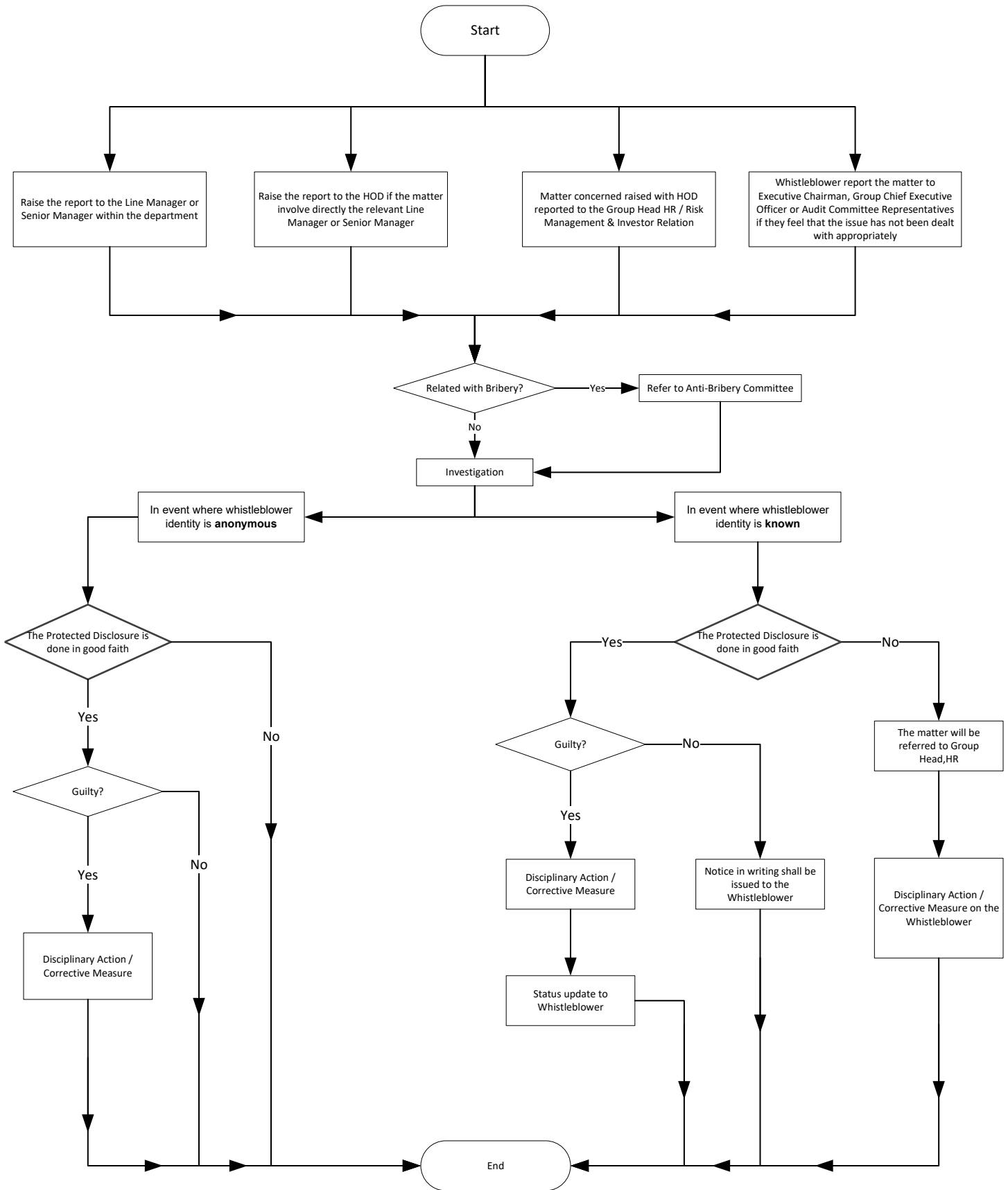
LOW WEN HAN
Group Head, Human Resource

Approved by:

DATO' SRI YEOH CHOON SAN
Executive Chairman

DATO' LEE KOK CHUAN
Group Chief Executive Officer

BERMAZ AUTO BERHAD GROUP WHISTLE-BLOWING Reporting Flow



BERMAZ AUTO BERHAD
GROUP WHISTLE-BLOWING POLICY
FREQUENTLY ASKED QUESTIONS (F.A.Q)

1. What is the purpose of the Whistleblower Policy?

The Whistleblower Policy establishes a framework for reporting concerns or unethical behavior within the company. It protects employees who come forward with information in good faith while ensuring accountability for false or malicious claims.

2. What is the Whistleblower Protection Act 2010, and how does it relate to Bermaz Auto Group?

The Whistleblower Protection Act 2010 is a legal framework that protects individuals who report wrongdoing within an organization. Bermaz Auto Group acknowledges and supports the protection of whistleblowers as outlined in this act.

3. Can whistleblowers expect their reports to be kept confidential?

Absolutely. Bermaz Auto Group is fully committed to ensuring the confidentiality of whistleblowers as permitted by law. This commitment aims to foster an environment for individuals reporting any misconduct.

4. Who can use the Whistleblower channel to report their concerns?

All Bermaz Auto employees, including Directors, are encouraged to use the Whistleblower channel to report their concerns.

5. What is a Protected Disclosure?

A Protected Disclosure refers to a whistleblower's formal report or complaint regarding alleged wrongdoings within the organization. It is designed to protect the Whistleblower from retaliation.

6. How can employees provide information under this policy?

Employees can provide information confidentially and anonymously, ensuring independent and unbiased reporting. The information is directed to the Group's Audit Committee.

7. Are there specific examples of matters that should be reported?

Yes, examples include criminal offenses like fraudulent activities, financial irregularities, bribery, racial or sexual harassment, and deliberate concealment related to these issues. The list provided is not exhaustive.

8. How is false or malicious intent determined?

If proven that the Whistleblower raised the matter with false or malicious intent, the individual may be subjected to disciplinary actions by the Human Resource Department.

9. Who administers the Whistleblower Policy?

The Policy is administered by:

- (i) Group Head Human Resource (HR); and
- (ii) Assisted by the Group Head Risk Management & Investor Relation, with direct reporting to the Executive Chairman / Group CEO / Audit Committee Representatives

10. What are the methods provided by BAuto Group for reporting whistleblower issues?

BAuto Group provides preferred reporting methods for whistleblowers:

- (i) raising the reported disclosure concern with the immediate **Line Manager** or another **Senior Manager** within the Department and
- (ii) reporting the matter to the respective **Head of Department (HOD)** if it involves the relevant Line Manager or Senior Manager.
- (iii) If the reported matter involves the Head of Department (HOD), it should be reported to the **Group Head, Human Resource / Group Head, Risk Management & Investor Relation**.
- (iv) If the Whistleblower feels the issue has not been appropriately addressed, they should report the matter to the **Executive Chairman, Group Chief Executive Officer (Group CEO), or Audit Committee Representatives**.

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FREQUENTLY ASKED QUESTIONS (F.A.Q)**

11. Can I report a concern anonymously?

Yes, it is possible to report a concern anonymously. However, it's important to note that it is generally easier to investigate and resolve issues if the Whistleblower's identity is known. Additionally, providing your identity allows for appropriate feedback on the investigations.

12. What is the recommended mode of reporting?

The Whistleblower should report the matter in writing and provide all supporting documentation whenever possible. If this is not possible, oral reporting is acceptable.

13. What happens after the investigation is concluded?

The results of the investigation will be brought to the attention of the Company's Group Audit Committee. The findings or outcome will be made available, and appropriate feedback will be given to the whistleblower if their identity is known.

14. Is there a specific time frame for concluding the investigation?

The investigation will be concluded within a reasonable time frame, considering the nature of the matters disclosed in the Protected Disclosure.

15. Who handles cases where the Protected Disclosure is not made in good faith?

Cases where the Protected Disclosure is not made in good faith will be referred to the Group Head, Human Resource, for consideration of appropriate disciplinary action.