



Goodway Integrated Industries Berhad

(Company No. 618972-T)
(Incorporated in Malaysia)

Whistleblowing Policy

Table of Contents

1.0	Introduction	1
2.0	Scope of Policy	1
3.0	Safeguards	2
4.0	Confidentiality	2
5.0	Disclosure Methods.....	2
6.0	Handling of a reported Concern.....	3
7.0	Review of the Policy	4

Version History:-

VERSION	DATE	AUTHOR	REASON(S)	REVIEWED BY/DATE	DATE APPROVED BY BOD
1.0	18 August 2016	Pang Kong Chek	Initial policy	-	18 August 2016

Whistleblowing Policy

1.0 Introduction

- 1.1 Goodway Integrated Industries Berhad Group of Companies (the “Group”) is committed to carrying out its business in accordance with the highest standards of professionalism, honesty, integrity and accountability. As such, the Group recognises that whistleblowing is an important means in attaining this as among others, whistleblowing will assist in preventing and detecting misconduct or other wrongdoing (“Misconduct”) within the Group.
- 1.2 This Whistleblowing Policy (the “Policy”) intends to provide a framework to promote responsible and safe whistleblowing without fear of adverse consequences and permits the Group to address such reports by taking the appropriate action(s). The strategies incorporated in this Policy include addressing reporting, responsibility, confidentiality and effective investigation as well as the protection offered to the persons making those disclosures from detrimental action.

2.0 Scope of Policy

- 2.1 The Group’s personnel and third parties, such as suppliers, agents, contractors, customers and other stakeholders, can use the procedures set out in this Policy to report any suspected Misconducts (“Concerns”) within the Group. It is however important to note that reported Concerns expressed anonymously are more difficult to act upon effectively but they will be considered, taking into account the seriousness and credibility of the issues raised and the likelihood of confirming the allegation from attributable sources and information provided.
- 2.2 Misconducts include, but are not limited to, the following:-
- ❖ Bribery, blackmail and miscarriage of justice;
 - ❖ Anti-trust;
 - ❖ Money laundering;
 - ❖ Criminal offence;
 - ❖ Corporate misconduct;
 - ❖ Failure to comply with legal obligations;
 - ❖ Harassment and victimisation;
 - ❖ Fraud or mismanagement;
 - ❖ Breach of any of the Group’s internal policies or procedures;
 - ❖ Unauthorised disclosure of confidential information;
 - ❖ Actions likely to damage the Group’s reputation;
 - ❖ Actions which cause damage to the environment; and
 - ❖ Actions which are intended to conceal any of the above.

3.0 Safeguards

- 3.1 It is the Group’s policy to safeguard the person making a protected disclosure (the “whistleblower”) of the Concerns from any act of interference that may be detrimental to the whistleblower. The whistleblower will also be protected against being dismissed or penalised by the Group and the Group will consider mitigating circumstances if the whistleblower is involved in the activity being reported.
- 3.2 In view of the above, if a whistleblower believes that he/she is being subjected to discrimination, retaliation or harassment for having made a report under this Policy, he/she should immediately report those facts to the Chief Executive Officer (“CEO”) or the Chairman of the Audit and Risk Management Committee (“ARMC”). Reporting should be done promptly to facilitate investigation and the taking of appropriate action.
- 3.3 This Policy is however meant to protect genuine whistleblowers from any unfair treatment as a result of their report, therefore, reported frivolous and bogus Concerns will be disregarded. The Policy is also not a route for taking up personal grievances as these should be taken up directly with Division or Department heads.

4.0 Confidentiality

- 4.1 The Group assures that all reported Concerns will be treated with strict confidentiality and upon verification of genuine cases, prompt investigation will be carried out. Further, every effort will be made to ensure that confidentiality is maintained throughout the process.
- 4.2 Every effort will also be made to treat the whistleblower's identity confidential unless the whistleblower expressly agrees otherwise and provides his/her agreement in writing or otherwise required by law.

5.0 Disclosure Methods

- 5.1 The Group’s personnel and third parties who becomes aware of a Concern is encouraged to make a disclosure as soon as possible but he/she also needs to demonstrate that he/she has reasonable belief of the Concern.
- 5.2 The Concern may be raised orally or in writing but when a disclosure is made orally, the person receiving the disclosure shall, as soon as it is practicable, put it in writing.
- 5.3 It is important to note that as it is essential for the Group to have all critical information in order for it to be able to effectively evaluate and investigate the Concern, the report made should provide as much detail and be as specific as possible including details of the Concern, details of the parties involved, dates or period of time, particulars of documentary evidence and/or witnesses, if any, and contact details.

Having said the above, disclosure of a Concern can still be made even though the person making the disclosure is not able to identify a particular person to which the disclosure relate to, if he/she has reasonable belief of the Concern.

5.4 The disclosure of the Concerns are to be made as follows:-

- a) All Concerns should be raised with the Group Finance Manager and the contact details of the Group Finance Manager are as follows:-

Contact no.	:	+603-5632 9981
Email address	:	pangkongchek@giibworld.com

- b) Should however the whistleblower have a reasonable belief that the above avenue would not be sufficiently independent, the whistleblower can raise the Concerns with the CEO at the following:-

Contact no.	:	+603-5632 9981
Email address	:	taiboonwee@giibworld.com

- c) If the report contains allegations against a Management personnel, the whistleblower can raise the Concerns with the Chairman of the ARMC, namely, Mr. Ramlee bin Mohd Shariff at the following:-

Contact no.	:	+603-5632 9981
Email address	:	whistleblowing@giibworld.com

- d) Alternatively, the whistleblower may choose to write a letter directly to A-06-03, Empire Tower 1, Jalan SS16/1, 47500, Subang Jaya , Selangor, labelling with a legend such as "To be opened either by the Group Finance Manager, CEO or the Chairman of the ARMC only", where applicable.

5.5 All acts of whistleblowing shall be deemed to have been made in good faith until investigations prove otherwise.

6.0 Handling of a reported Concern

6.1 The action to be taken by the Group will depend on the nature of the Concerns. In general, initial inquiries will be made by either the Group Finance Manager, CEO or the Chairman of the ARMC, where applicable, to determine whether an investigation is appropriate and the form that it should take. This is so as some Concerns may be resolved without the need for investigation.

Guidance or Direction from the CEO nonetheless has to be sought for all Concerns raised with the Group Finance Manager.

- 6.2 If an investigation is necessary, an investigator will be appointed by either the Group Finance Manager, CEO or the Chairman of the ARMC, where applicable, to conduct the investigation. All information disclosed during the course of the investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations.
- 6.3 At the conclusion of the investigation, the investigator will submit a written report to either the Group Finance Manager, CEO or the Chairman of the ARMC, where applicable, for further action. And if necessary, the matter will be reported to a higher level.

The Group reserves the right to refer any Concerns to the relevant external authorities.

- 6.4 The investigator is required to report the status of all pending and on-going investigations, if any, to either the Group Finance Manager, CEO or the Chairman of the ARMC, where applicable, at the end of each month.
- 6.5 The protection accorded for any specific act of whistleblowing mentioned in 3.0 above shall continue to be accorded to the whistleblower should the investigation result in the allegations made by the whistleblower be found to be true for as long as the whistleblower remains a personnel of the Group, but only in relation to that specific act of whistleblowing.

Further, no adverse actions shall be taken against the whistleblower if it is found that the whistleblowing was done in good faith and for the good of the Group, even if the reported Concern is ultimately found to be untrue. Nonetheless, if the reported Concern is found to be frivolous, malicious or for personal gain, the appropriate action will be taken against the whistleblower including disciplinary or legal proceedings.

- 6.6 The Group reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation particularly if this infringes a duty of confidentiality owed to others.

7.0 Review of the Policy

- 7.1 The Policy shall be reviewed from time to time and recommendations made to the Board of Directors of Goodway Integrated Industries Berhad for any amendments deemed appropriate, to ensure that, among others, the Policy remains relevant to the Group's needs, continues to reinforce the strategic objectives of the Group and will reflect changing legal, regulatory and ethical standards.