



# **Yee Lee Corporation Bhd**

**Registration No. 197301000057 (13585-A)**

**(Incorporated in Malaysia)**

## **WHISTLEBLOWING POLICY**



## **WHISTLEBLOWING POLICY**

### **(A) GENERAL**

1. This Policy addresses Yee Lee Corporation Berhad's (YLCB) commitment to high Standards of integrity, ethical, moral and legal business conduct.
2. The Policy establishes a procedure that allows employees of YLCB and other interested persons to anonymously and confidentially, or otherwise, submit their concerns to the Company Secretary and/or the Audit Committee Chairman regarding unethical conduct or illegal practices, without fear of reprisals or victimisation.
3. Employees are encouraged to speak with their supervisors, managers or other appropriate personnel regarding observed illegal, unethical or other behaviour which adversely affects YLCB's reputation or policies.
4. An investigation team will be set up to investigate the concerns raised and will report their findings to the Audit Committee Chairman.
5. The effectiveness of an investigation and follow-up on any submitted report may be improved if the investigator can seek clarification and further information from the person submitting the report. For those who are not willing or not able to provide their name when submitting a report, this Policy permits and recognises complete anonymity and without prejudice on the part of the investigator.

### **(B) WHISTLEBLOWER PROTECTION**

1. YLCB shall not take adverse employment action (i.e. penalty, dismissal, demotion or suspension) against an employee in retaliation of his/her following actions:-
  - a) reports what the employee believes constitutes a violation of any in-house guidelines, rules and regulations of YLCB or externals industrial and regulatory guidelines that are relevant or are observed/implemented by YLCB.
  - b) any provision of law relating to fraud committed by staff or against YLCB's customers, or breach of any YLCB's policy relating to ethical practice, conflicts of interest, or similar policy breach, if made in good faith.
  - c) providing information or causing information to be provided in an investigation conducted by any regulatory agency or authority (such as police, government agencies and ministries, Securities Commission, MACC) or any person at YLCB, arising from any such report.
  - d) participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with any such report.
2. This policy is intended to encourage reporting of wrongdoing by YLCB's employees and other stakeholders, and presumes that all will act in good faith and will not make false accusations.
3. Any employee who knowingly or recklessly makes allegations in bad faith may be subject to disciplinary action which may include termination.



## **WHISTLEBLOWING FRAMEWORK**

### **A. Whistleblowing Procedures**

1. The Whistleblowing procedures outline the Company's commitment to have a channel in which the employees, suppliers, vendors, contractors and members of public are able to report instances of unethical, unlawful or undesirable conduct.
2. The report must be in writing, submit via post or email. To ensure that there is a clear understanding about the issue(s) raised, the report should be sealed in an envelope if sent via post with "**Strictly Private & Confidential**" indicated and addressed to either:-

Ms. Tan Boon Ting  
Company Secretary  
Yee Lee Corporation Bhd.  
Lot 85, Jalan Portland,  
Tasek Industrial Estate,  
31400 Ipoh, Perak,  
Malaysia.  
Email: [bttan@yeelee.com.my](mailto:bttan@yeelee.com.my)

Or

Dato' Mohd Adhan bin Kechik  
Chairman of the Audit Committee  
Yee Lee Corporation Bhd.  
Lot 85, Jalan Portland,  
Tasek Industrial Estate,  
31400 Ipoh, Perak,  
Malaysia.  
Email: [acchair@yeelee.com.my](mailto:acchair@yeelee.com.my)

3. His/Her statements are to be recorded in the Whistleblowing Form. Reports received anonymously will be treated with confidentiality.
4. An independent investigation team will be set up by the Top Management to investigate any major concerns within a reasonable timeframe.
5. Upon completion of the investigation, the findings will be submitted to the Audit Committee for their deliberation. A copy is distributed to the Top Management for their attention. Preventive measures will also be implemented to avoid similar situation from recurring.



**B. Roles and Responsibilities**

1. The involvement of various parties is vital to make this Whistleblowing Policy effective. The roles of the parties involved and their accountabilities are listed as follows:-

**a) Whistleblower**

- i. Bring to early attention of the organisation of any genuine and serious malpractice or misconduct in which he/she becomes aware with sufficient cause of concerns.
- ii. Cooperate with the investigating authorities and maintain strict confidentiality of the case being brought up.

**b) Recipient of Report**

- i. The Company Secretary and the Audit Committee Chairman shall be the primary contact persons.
- ii. The Company Secretary is to record the concerns received in the Whistleblowing Form, and ascertain the credibility of the issue being raised as well as whether there is sufficient basis for detailed investigation.
- iii. Communicate to the Top Management which decides on whether a detailed investigation is to be carried out.

**c) Audit Committee**

- i. Review and determine appropriate decision and/or actions for the reported concerns by the investigation team.
- ii. Ensure reasonably sufficient protections and processes for managing the Whistleblowing function.
- iii. Ensure the investigation team have performed their due diligence in carrying out their responsibilities, e.g. sufficient facts had been disclosed by the Recipient and the Investigators had carried out a thorough investigation.
- iv. Present the Investigation Report with recommended course of action to the Board of Directors.
- v. The Audit Committee Chairman has been designated as the person to whom all Whistleblowing concern or complaints may be directed.

**d) Top Management**

- i. Briefed by the Audit Committee and decide on whether a detailed investigation is required.
- ii. The Group Managing Director, Group Chief Executive Officer and Group General Manager/Executive Director will select suitable personnel to carry out the investigation.
- iii. An Investigation Head is appointed to oversee the proceeding, and come out with the report.



**B. Roles and Responsibilities (Cont'd)**

**e) Investigation Team**

- i. Conduct investigation without bias and prejudice.
- ii. Ensure complete fact finding with strict confidentiality.
- iii. Decide the outcomes on whether malpractice has been committed and recommend the appropriate course of action (preventive measure, disciplinary action, etc.)
- iv. Document all the findings properly and prepare report on the investigation.
- v. Submit Investigation Report to the Audit Committee and a copy is to be circulated to the Top Management.

**f) The Board**

- i. Implemented a formal Whistleblowing Policy and set up an independent channel for all the employees and stakeholders to anonymously report any concerns or complaints of illegal conduct, malpractice or potential misconduct.
- ii. Promote ethical behaviour and ensure that employees who raise concerns or complaints regarding any illegal conduct or malpractice in good faith will not be subjected to victimisation, harassment or discriminatory treating and to have such concerns or complaints properly investigated.

**C. Whistleblower Protection**

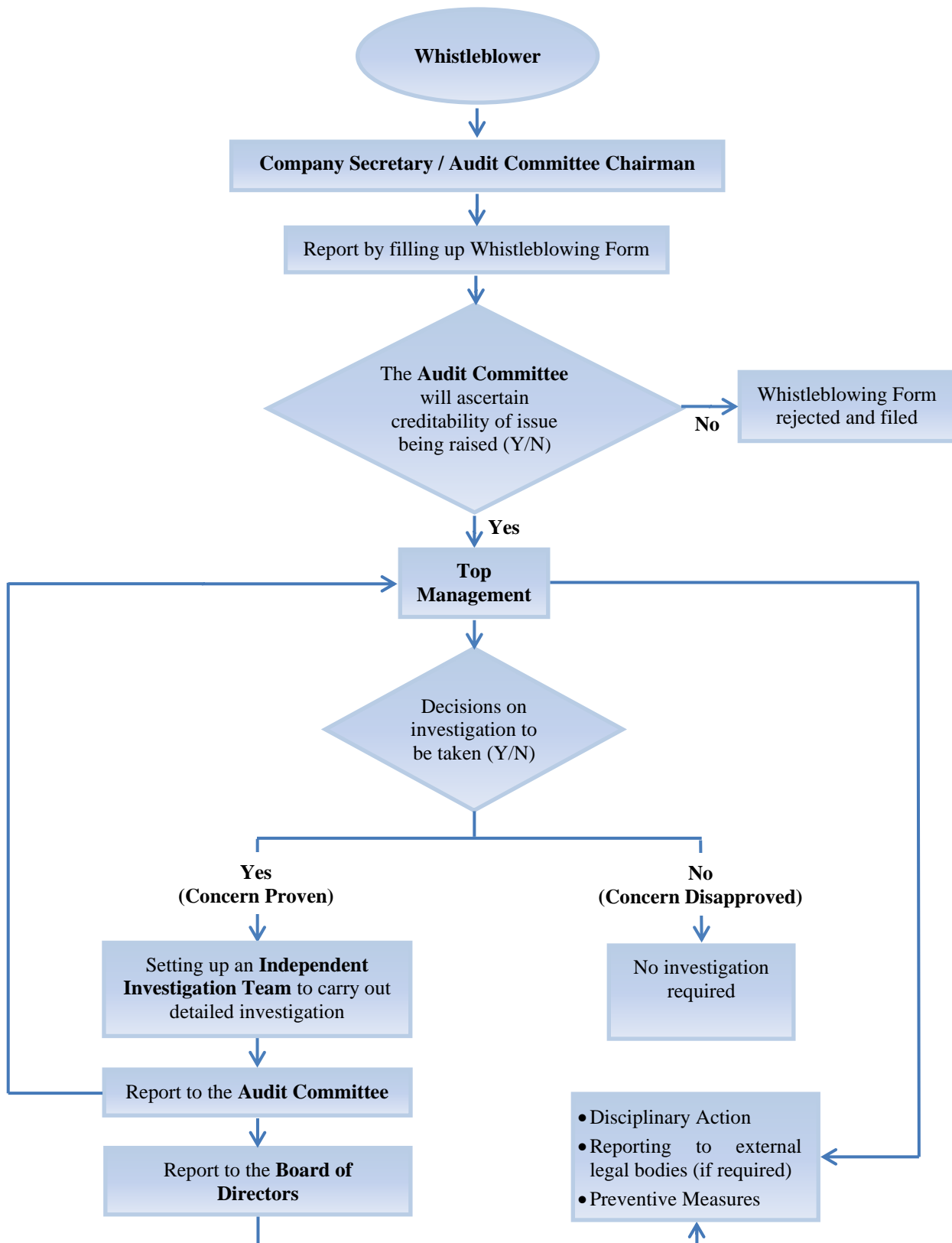
1. The Company shall not take adverse employment action (i.e. penalty, dismissal, demotion or suspension) against an employee in retaliation of his/her following actions:-
  - (a) reports what the employee believes constitutes a violation of any in-house guidelines, rules and regulations of the Company or external industrial and regulatory guidelines that are relevant or are observed/implemented by the Company.
  - (b) any provision of law relating to fraud committed by staff or against the Company's customers, or breach of any Company's policy relating to ethical practice, conflict of interest, or similar policy breach, if made in good faith.
  - (c) providing information or causing information to be provided in an investigation conducted by any regulatory agency or authority (such as police, government agencies and ministries, Security Commission, MACC) or any person at the Company, arising from any such report.
  - (d) participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with any such report.
2. Any employee that knowingly or recklessly makes false and malicious allegation in bad faith to discredit, humiliate or damage the reputation of another party may be subject to disciplinary actions which include dismissal.

**D. Whistleblower Protection Act 2010**

In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010 ("Act"), the Act shall prevail.



## Whistleblowing Flow Chart





## **WHISTLEBLOWING FORM**

### **A. Details of suspect**

1. Name of person alleged: \_\_\_\_\_

2. Designation of person alleged: \_\_\_\_\_

3. Name of Department or Subsidiary: \_\_\_\_\_

4. Please describe the alleged wrongdoing:-

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

5. Incident date: \_\_\_\_\_

6. Incident time: \_\_\_\_\_

7. Location of incident: \_\_\_\_\_

8. Please attach a separate narrative if necessary and provide any evidence or document that will support your claim.

9. Please provide information of any other parties that are involved and other information you may find relevant.



**B. Witness details**

Please provide the contact details of the witnesses to the alleged incident.

**Witness #1**

Name : \_\_\_\_\_

Phone : \_\_\_\_\_

Email : \_\_\_\_\_

**Witness #2**

Name : \_\_\_\_\_

Phone : \_\_\_\_\_

Email : \_\_\_\_\_

**C. Act in Good Faith**

Your act of reporting the wrongdoing committed by the alleged person signifies that you have read the Company's Whistleblowing Policy and you are making the report in good faith.

**D. Your Contact**

Your Name : \_\_\_\_\_

Your Phone : \_\_\_\_\_

Your Email : \_\_\_\_\_

If you decide to remain anonymous, please contact us within two weeks of your report as we may need additional information concerning the alleged wrongdoing.

**E. Declaration:** (include a whistleblower who wishes to remain anonymous)

I declare that this Report is made by me without malicious intent, not carelessly but is made after due and careful inquiry.

Signature:

\_\_\_\_\_

Name:

Date: