

Public Packages Holdings Berhad Whistleblowing Policy

Public Packages Holdings Berhad (“PPHB”) is committed to maintain highest standard of ethical behaviour, integrity and transparency at the workplace of the Group (“PPHB and its subsidiaries”).

Objective

The purpose of this Policy is to provide an avenue for Directors, employees and any external parties to report any improper conduct committed by a Director or an employee of PPHB in accordance with the procedures as provided under this policy.

Scope

This policy is designed to provide Directors, employees and any external parties with a formal, confidential channel to disclose any improper conduct (misconduct and criminal offence) at the earliest opportunity so that concerns can be raised without fear of reprisal or detrimental action. The misconduct and criminal offence include, but not necessarily limited to the following areas: -

- (a) Fraud;
- (b) Bribery, corruption and theft;
- (c) Abuse of power;
- (d) Non-compliance with the procedures;
- (e) Failure to comply with legal and regulations obligations;
- (f) Conflict of interest; and
- (g) Misuse of company’s property.

Grievance Procedure

If any person who believes any improper conduct exist in the workplace, the person should report directly to Human Resources Manager or email to dedicated whistleblowing email address, khoosc@pph.com.my. Anonymous reports are not encouraged as any follow up to ascertain the facts or to obtain any further information for investigation purposes would be very difficult.

All the report received will be analysed by the Investigation Team. Subsequently, the reports will be tabled in the Audit Committee Meeting.

Any Director or employee who has engaged in improper conduct may be subject to disciplinary action. Although the Audit Committee may, in its discretion, on a case-to-case basis decides to consider leniency for such Director or employee, it should be noted that the Company has no power to provide such persons any immunity from criminal prosecution.

The whistle-blower shall be informed on the result of any investigation and/or any action taken by PPHB in respect of the disclosure in accordance with this policy.

Whistle-blowers Confidentiality and Protection

A whistle-blower will be accorded with protection of confidentiality of identity, unless the law required otherwise. However, there may be circumstances, during the course of the investigation where it will be necessary to disclose the identity of the whistle-blower. If such circumstances, the Investigation Team shall endeavour to inform the whistle-blower that his/her identity is likely to be disclosed and to obtain his/her consent for the said disclosure.

The protection conferred under this policy is not affected notwithstanding that the disclosure of improper conduct does not result in any disciplinary action on the person against whom the disclosure was made.

If a whistle-blower believes that he or she is being subjected to discrimination, retaliation, unfair dismissal, demotion, harassment, or any action causing damage to the whistle-blower, he or she should immediately report those facts to Human Resources Manager. Any employee who takes any such detrimental action against a whistle-blower shall be subject to disciplinary action. Note, however, that the Company does not have any power to grant any protection from such detrimental action to a whistle-blower who is not an employee of PPHB.

Since an allegation of improper conduct may result in serious personal repercussions for the person that has allegedly committed an improper conduct, all whistle-blowing reports have to be made in good faith with reasonable belief that information and allegation is true. The reports shall not be lodged for personal interest and there shall be no false accusation. Otherwise, necessary disciplinary actions may be taken against the whistle-blower, and such whistle-blower shall not be entitled to any protection conferred under this policy.

Review

This Policy shall be reviewed regularly to ensure that it continues to remain relevant and appropriate.