

PUBLIC PACKAGES HOLDINGS BERHAD WHISTLEBLOWING POLICY AND STATEMENT

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

Objective

The purpose of this Policy is to provide a formal, confidential channel for Directors, employees and any external parties to report, in good faith, serious concerns of any improper conduct committed by a Director or an employee of PPHB Group without fear of reprisal or detrimental action.

Scope

This Policy applies to all Directors and employees of PPHB Group. A report of improper conduct may be made by any Director, employee or external party who has knowledge of an improper conduct committed by a Director or employee of PPHB Group.

Improper conduct is generally described as any conduct by a Director or an employee of PPHB Group which if proven constitutes a criminal offence or any conduct that constitutes a wrongdoing or malpractice and may include, but is not limited to any of the following: -

- (a) Fraud;
- (b) Bribery, corruption and theft;
- (c) Abuse of power;
- (d) Theft or embezzlement;
- (e) Harassment, threat, violence;
- (f) Conflict of interest; and
- (g) The deliberate concealment of information concerning any of the matters listed above.

Grievance Procedure

If any person believes any improper conduct exists in the workplace, the person should report directly to the Managing Director (or email to PPHB Group’s dedicated whistleblowing email address, b_m@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.

The Audit Committee shall be informed of any new reports of improper conduct and may request to review the records at any time.

Upon receipt of a report, the Managing Director is authorized to form an investigation team which may consist of Corporate Manager/ General Manager/ Director or any person within PPHB Group who holds a similar or higher position. All the reports received will be analysed by the Investigation Team. In the event the allegation is substantiated, the Managing Director will identify and recommend the corrective action(s) to be taken to mitigate the risks of such improper conduct recurring and recommend if disciplinary action is to be taken against the wrongdoer.

Subsequently, the investigation reports together with the recommendation of the Managing Director will be tabled at the Audit Committee Meeting. The Audit Committee will review the final reports and decide on the corrective action and/or disciplinary action to be taken.

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

Subject to any prohibition in law or any legal requirements, 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. In 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/she should immediately report those facts to the Managing Director. Any employee who takes any such detrimental action against a whistle-blower shall be subject to disciplinary action. Note, however, that PPHB does not have any power to grant any protection from such detrimental action to a whistle-blower who is not an employee of PPHB Group.

Since an allegation of improper conduct may result in serious personal repercussions for the person who has allegedly committed an improper conduct, all whistle-blowing reports have to be made in good faith with reasonable belief that the 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.

PUBLIC PACKAGES HOLDING BERHAD
WHISTLEBLOWING FORM

WHISTLEBLOWING REPORTING			
To:			
Incident Date:		Incident Time:	
Incident Location:			
Name of alleged person/ department / division			
Description / Circumstances of alleged incident (Please use attachment if necessary)	• <i>What, Who, When, Where, How.</i> • <i>Evidence to support the report is require</i>		
Signature	:		
Name	:		
Department/ Division	:		
Mobile No.	:		
Date	:		
Note: It is necessary to provide name and contact number in order for the investigation team able to contact for any require further information.			