

NYLEX (MALAYSIA) BERHAD
[Registration No.: 197001000148(9378-T)]
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY

1. POLICY STATEMENT

Nylex (Malaysia) Berhad (“Nylex” or “Company”) is committed to upholding values and highest standard of work ethics for all its directors, managers and employees in line with good corporate governance and business integrity practices.

The Company has adopted this Whistle-blowing Policy (“Policy”) to provide an avenue for the employees of the Company and its subsidiary companies (“Group”) and members of the public to raise genuine concerns of any wrongdoing or improper conduct involving the Group and its directors, managers or employees.

2. OBJECTIVE

The objective of this Policy is to encourage reporting of any suspected fraud, corruption, conduct or inappropriate behavior of the Group. The Policy will provide an avenue for all employees of the Group and all its agents, vendors, contractors, suppliers, consultants and customers and members of Nylex to raise concerns about any improper conduct without fear of retaliation and to offer protection for the reporter who reports such allegations. This will strengthen the accountability and transparency in the business affairs of the Group.

3. TYPE OF IMPROPER CONDUCT

Under the statutory framework, “improper conduct” is taken to mean any conduct which if proved, constitutes a disciplinary offence or a criminal offence. The following list, which is not exhaustive, shall constitute “Reportable Misconduct” under this Policy:

- a) Fraud, misappropriation of funds or assets;
- b) Bribery, corruption or blackmail;
- c) Violation of the Company’s code of conduct, procedures or policies;
- d) Improper or unethical conduct or behavior;
- e) Conflict of interest;
- f) Theft or embezzlement of fund or assets;
- g) Abuse of power or position;
- h) Breach of confidentiality;
- i) Criminal breach of trust;
- j) Failure to comply with any legal obligations or breach of internal control;
- k) Danger to health and safety of any employee of Nylex or any other individual;
- l) Sexual harassment.

4. PROTECTION FOR WHISTLE-BLOWER

Nylex is committed to ensuring confidentiality in respect of all matters raised under this Policy.

a) Confidentiality

The confidentiality of the identity of the whistle-blower will be ensured and protected, unless otherwise required by law. Nylex assures that all reports will be treated in the strictest of confidence and will be promptly investigated.

b) Assurance against retaliation and immunity from disciplinary action

This Policy provides assurance that the whistle-blower, if an employee of the Group, shall be protected against retaliation and enjoy immunity from any civil or criminal liability or any liability by way of administrative process, including disciplinary action from the whistle-blower's immediate supervisor or department/division head or any other person exercising power or authority over the whistle-blower in his/her employment.

5. REPORTING WITH REASONABLE BELIEF

Nylex expects its employees and stakeholders to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal. However, a person should make disclosure based on reasonable belief that any person has engaged, is engaging or is preparing to engage in improper conduct, provided that such disclosure is not specifically prohibited by any written law.

There are, however, instances where whistle-blower protection will be revoked, for example, in such circumstances as the whistle-blower himself has participated in the improper conduct disclosed, or the disclosure made is frivolous or vexatious or, the whistle-blower willfully made disclosure that he knew or believed to be false.

Malicious and false allegations reported by employees will be viewed seriously and treated as gross misconduct. If proven, it may lead to dismissal. The Company will also take appropriate action against the employees and / or stakeholders concerned including legal action, where appropriate.

If, however, a report is made in good faith, and a subsequent investigation proves it to be untrue, the whistle-blower will still be eligible for protection under this Policy.

6. WHISTLE-BLOWING CHANNEL

The channel of reporting is through the Company's website at www.nylex.com using the Form provided. The report must be in writing, submit via email or post (**marked "Strictly Confidential"**), to ensure that there is a clear understanding about the issues raised. The report shall be directed to the Integrity Officer and copied to the Chairman of the Audit Committee and the Company Secretary. The whistle-blower shall disclose his/her personal identity in the form attached, and anonymous whistle-blowing reports will be considered only at the discretion of the Company.

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The Company may, however, consider investigating an anonymous allegation after having assessed the following:

- a) the seriousness of the concern;
- b) the credibility of the concern; and
- c) the likelihood of confirming the concern from credible sources.

Channels of reporting are as follows:-

Name	Email	Telephone	Address
Integrity Officer	cio.integrity@nylex.com	+603-5519 1706 Extension 325	C/O Nylex (Malaysia) Berhad – Corporate Office Lot 16, Persiaran Selangor, Section 15, 40200 Shah Alam, Selangor Darul Ehsan Malaysia
Chairman of the Audit Committee	edmondcheah@gmail.com	+6012-330 5499	C/O Nylex (Malaysia) Berhad – Corporate Office Lot 16, Persiaran Selangor, Section 15, 40200 Shah Alam, Selangor Darul Ehsan Malaysia
Company Secretary	choo-se-eng@ancom.com.my	+603-7495 5098	C/O Nylex (Malaysia) Berhad – Corporate Office Lot 16, Persiaran Selangor, Section 15, 40200 Shah Alam, Selangor Darul Ehsan Malaysia

Upon receiving a report, the Integrity Officer must act promptly to investigate and resolve the issue.

The whistle-blower shall be informed of the progress and outcome of the investigation.

7. AMENDMENT OF POLICY

This Policy cannot be amended without approval from Nylex’s Board. It will be reviewed from time-to-time to ensure that it remains effective and meets best practice standards and the needs of Nylex.

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

The Whistle-Blowing Policy was adopted by the Board on 24 July 2019 and it was reviewed on 28 July 2020.

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WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Group. Please note that you may be called upon to assist in the investigation, if required.

** Compulsory field*

REPORTER'S CONTACT INFORMATION	
Name *	
Designation	
Department	
Contact No.	
Email Address *	
SUSPECT'S INFORMATION	
Name *	
Designation	
Department *	
Contact No.	
Email Address	
WITNESSES'S INFORMATION (if applicable)	
Name	
Designation	
Department	
Contact No.	
Email Address	
COMPLAINT: <i>Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</i>	
1. What misconduct / improper activity occurred?*	
2. Who committed the misconduct / improper activity?*	
3. When did it happen and when did you notice it?*	

4. Where did it happen?*

5. Is there any evidence that you could provide us?

6. Are there any other parties involved other than the suspect stated above?

7. Do you have any other details or information which would assist us in the investigation?

8. Any other comments?

Date:

Signature: