

WHISTLEBLOWER POLICY

WHISTLEBLOWER POLICY WITHIN PBA HOLDINGS BHD GROUP OF COMPANIES

“Whistleblowing” involves the disclosure of information to the relevant authorities by specific employees (within PBAHB and its subsidiaries), vendors and the general public, who discover breaches of the securities laws or any possible serious violation of internal policies, procedures or external laws by the perpetrators, culprits or fraudsters.

The **WHISTLEBLOWER POLICY** gives protection to such persons against harassment or victimisation as a result of such disclosures. The Company has established internal procedures for handling employee concerns, to assist companies to address any shortcomings within its processes, and to facilitate good governance practices. Therefore, employees, vendors and the general public are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and malpractices at the earliest opportunity via the appropriate channel.

THE UNDERLYING FUNDAMENTALS AND RATIONALE OF THE POLICY

- i) All concerns raised will be treated fairly and properly;
- ii) The Company will not tolerate harassment or victimisation of the employees, vendors and the general public raising genuine concerns;
- iii) Any employee, vendors and the general public making a disclosure will retain anonymity unless he agrees otherwise;
- iv) The Company will ensure that the employees, vendors and the general public raising a concern is aware of who is handling the matter;
- v) The Company will ensure no employees, vendors and the general public will be at risk of suffering any form of reprisal as a result of raising a genuine concern;
- vi) To enable the Company to achieve the highest possible standards of corporate governance ethical standards;
- vii) The Company’s workforce represents a valuable source of information that can be utilised to identify a potential problem, and deal with it, before it causes potential damage to the Company’s reputation or stakeholders;
- viii) This Policy provides employees, vendors and the general public with a secure channel of reporting impropriety in the knowledge that the matter will be treated confidentially; and
- ix) An effective whistleblowing procedure will provide an open, honest and accountable culture amongst all employees, vendors and the general public where they can express their concerns, without fear of victimisation or termination of employment.

To report any incidents, please contact any of the following Company Directors who have been appointed as the Liaison Officers, via telephone, mail or email. The appointed persons will act promptly to investigate the issue:

YB Dato’ Seri Haji Zulkifli bin Long

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Email : zulkifli.long@penang.gov.my

YBhg. Dato’ Brian Tan Guan Hooi

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PBA Holdings Bhd.

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