



Whistleblowing Policy

PURPOSE

Eversafe Rubber Berhad is committed to ensure that anyone is able to raise concerns regarding any illegal conduct or malpractice without being subjected to victimization, harassment or discriminatory treatment, and to have such concerns properly investigated.

This policy sets out the mechanism and framework by which employees, directors, shareholders, consultants, vendors, contractors, external agencies or any parties having relationship with Eversafe Rubber Berhad can confidently voice concerns / complaints in a responsible manner without fear of discriminatory treatment.

SCOPE

The Whistleblowing Policy applies to the company and all its subsidiary companies. All employees, Directors, shareholders, Consultants, Vendors, Contractors, Outside agencies or any parties with a business relationship with the Company or its subsidiaries are encouraged to disclose any wrongdoing that may adversely impact the Company.

POLICY

- a) The Company encourage the employees or other stakeholders to make any disclosures openly and honestly and that concerns and complaints raised will be treated fairly and properly.
- b) All disclosures made under this Policy will be dealt with in a confidential manner. Disclosures received under anonymity will not be entertained to prevent invalid malicious reporting, poison letter, exploitation and victimization.
- c) The Whistleblowing is required to identify himself/herself and provide contact information in his/her report. This will facilitate the investigator to obtain further information, if required and communicate on results of investigation to the Whistleblower.

TYPE OF WRONGDOING

The following is a non-exhaustive list of examples of wrongdoing or improper conduct under the Whistleblowing Policy:-

- a) Fraud
- b) Bribery
- c) Corruption
- d) Criminal breach of trust
- e) Abuse of Power
- f) Theft or embezzlement
- g) Misuse of Company's Property
- h) Non Compliance with Procedure
- i) Any dishonest or fraudulent act
- j) Any act conflict of interest with suppliers, vendors or contractors



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WHISTLEBLOWING CHANNELS

- 1) The Whistleblower should report the suspected or known instances of wrongdoing directly to the Audit Committee Chairman of the Board.
- 2) The Whistleblower should disclose the following information :-
 - a) Name of whistleblower
 - b) Contact details
 - c) Detail of person(s) involved
 - d) Nature of allegation, time and venue of the incident took place
 - e) Provide evidence, if any together with the report

Whistleblower may choose to make an anonymous reporting but the Committee reserves its right to investigate or not to investigate the anonymous disclosure.

- 3) The reports can be done in writing, submit via post or email to Whistleblow@eversafe.com.my. Report prepared in such a manner must be properly sealed on an envelope and should be addressed to the registered address at :

Audit Committee Chairman / Company Secretary
Eversafe Rubber Berhad
Unit 30-01, Level 30, Tower A,
Vertical Business Suite
Avenue 3, Bangsar South
No.8, Jalan Kerinchi 59200 Kuala Lumpur
Tel: +6(03) 2783 9191 & Fax: +6(03) 2783 9111

- 4) The Company Secretary of the Company who receives the report will conduct a preliminary assessment on the whistleblower case received. The Company reserves the right to drop the whistleblower case received due to insufficient evidence or other factors.
- 5) Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified in the outcome of the disclosure.
- 6) All investigations shall be tabled to the Audit Committee of the Board during the Audit Committee Meeting and Audit Committee will subsequently update members of the Board on reports that require their attention and approval.

PROTECTION FROM RETALIATION

This Whistleblowing Policy provides an assurance to the whistleblower that he/she would be protected against any unfair practice not limited to retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal or promotion or any direct or indirect use of authority to obstruct the whistleblower from continuing making his/her disclosure.



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ACTING IN GOOD FAITH

The Company expects only genuine concerns are reported under whistleblowing procedures. The report should be made in good faith, accurate, factual, no element of malicious intent and not made for personal gain. If allegations are proven to be false or malicious, the parties responsible may be subject to appropriate disciplinary action, up to and including legal action, where appropriate.

CONFIDENTIALITY

The identity of the Whistleblower, the fact that the Whistleblower has made a Disclosure and the contents of the Disclosure will be kept confidential.

The Company shall treat all reports or disclosures confidentially and will not be disclosed to anyone except those who need to know for the purpose of investigating the matters referred to in the Disclosure or if required by law, court or authority.

REVIEW OF THIS POLICY

The Board of Directors or Board Audit Committee can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulation and or accommodate organizational changes within the Company. However, the modification made shall be effective after the same is circulated to employees in writing or electronically.