



## **XIN SYNERGY GROUP BERHAD**

200201024617 (592280-W)

### **WHISTLEBLOWING POLICY**

#### **1) POLICY STATEMENT**

- a) Xin Synergy Group Berhad (“XSGB” or the “Company”) and its subsidiaries (collectively referred to as the “Group”) are committed to the highest standard of integrity and maintaining high standard of accountability in the conduct of its businesses and operations. The Group aspires to conduct its affairs in an ethical, responsible and transparent manner which is vital to the success of the Group.
- b) In order to achieve and maintain these standards and good behavior at work through the Policy, the Company encourages the employees / other stakeholders to make any disclosures openly and honestly and that concerns / complaints raised will be treated fairly and properly.
- c) In this regard, the Group is committed to developing a culture of openness and honesty where a person who is aware of a potential malpractice or misconduct is encouraged to report such matters, in good faith, without fear of reprisal.
- d) The Group has in place a Whistleblowing Policy that sets out the channels and procedures for reporting improper conduct involving the employees of the Group and the protection accorded to Whistleblowers.
- e) 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 letters, exploitation and victimization.
- f) The Group views false and malicious allegations in any form or manner and the parties responsible may be subject to appropriate disciplinary action, including legal actions where applicable.

#### **2) WHISTLEBLOWING**

- a) Whistleblowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.
- b) Only genuine concerns should be reported under Whistleblowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

#### **3) TYPES OF IMPROPER CONDUCT**

Parties can report a whistleblowing complaint if they are aware of any improper conduct, including but not limited to the following:-

## XSGB - Whistleblowing Policy

- a) Criminal offence or unlawful act such as fraud, bribery and corruption, theft, embezzlement and blackmail;
- b) misappropriation of company's funds, securities, supplies or other assets;
- c) non-compliance with legal or regulatory requirements;
- d) sexual harassment;
- e) misuse of confidential information;
- f) abuse of power and position for personal gain;
- g) an act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
- h) giving false or misleading information (including suppression of any material facts or information); and
- i) the deliberate concealment of any of the above matter or other acts of wrong doing.

### 4) OUTCOME

- a) There will be no adverse consequences for anyone who reports a whistleblowing concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary action.
- b) The following actions may be taken after investigations into such a case have been completed:-
  - Disciplinary action (up to and including dismissal) against the wrongdoer dependant on the results of the investigation; or
  - Disciplinary action (up to and including dismissal) against the whistleblower if the claim is found to be malicious or in bad faith; or
  - No action to be taken if the allegation proves to be unfounded.

### 5) PROTECTION

- a) A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable.
- b) In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and rules and procedures involved.

### 6) WHISTLEBLOWING CHANNELS

- a) Parties submitting the complaints via emails, faxes or letters, should disclose their names, contact number, details of person(s) involved, nature of allegation, when and where the incident took place and provide evidence, if possible.
- b) Report regarding the Company's management, directors, employees, vendors, consultants and/or business associates:-

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Mail	:	Xin Synergy Group Berhad 556H, Century Garden, Jalan Sultan Azlan Shah, 11700 Gelugor, Pulau Pinang. Attention: Chairman of Audit Committee (Please mark "Strictly Confidential")