

# Whistleblower Procedure

## P-CG-003-V1.2

## 1.0 PURPOSE

The objective of this procedure is to provide a channel for any people including employee, workers and suppliers, to report any case of non-compliance to the Guan Chong Berhad (“GCB” or “the Group”) Code of Conduct or any GCB policies with full confidentiality granted.

## 2.0 SCOPE

This procedure covers all clauses in the GCB Code of Conduct and other GCB policies. Any persons, including employee, workers, suppliers and local communities, is allow to report any case of non-compliance of the Code of Conduct or any GCB policies to the Whistleblower Committee. This procedure covers the Group and its subsidiaries. Refer to Appendix 1 for the list of the Group’s subsidiaries.

## 3.0 PROCEDURE

**3.1** Whistleblower Committee is formed by GCB directors and independent directors to minimize conflict of interests. An email address ([whistleblower@favorich.com](mailto:whistleblower@favorich.com)) has been set up and is only accessible to Whistleblower Committee aforementioned.

**3.2** Methods to notify Whistleblower Committee in cases of any concern of non-compliance to GCB Code of Conduct or any GCB policies:

- Email to: [whistleblower@favorich.com](mailto:whistleblower@favorich.com)
- Write a letter to:  
**Whistleblower Committee**  
**PL0273, Jalan Timah 2, Pasir Gudang Industrial Estate,**  
**81700, Pasir Gudang, Johor, Malaysia.**

**3.2** Upon receipt of whistleblower report, the Whistleblower Committee shall assign appropriate Executive Committee (“EXCO”) members and/or senior managers to form the Investigation Unit to investigate the case within a week.

**3.3** Members of the Investigation Unit shall be completely independent from the case, the whistleblower and the relevant individuals. Great care shall be taken during the investigation of suspected improprieties or irregularities so as to avoid mistaken accusations or alerting suspected individuals that an investigation is under way.

**3.4** Members of the Investigation Unit will have:

- Free and unrestricted access to all of the Company’s records and premises, whether owned or rented; and
- The authority to examine, copy and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities on the premises without prior knowledge or consent of any individual who might use or have custody of any such items or facilities when it is within the scope of their investigation.

**3.5** Whistleblower shall not attempt to personally conduct investigations, interviews and interrogations related to any suspected non-compliance.

**3.6** All inquiries concerning the activity under investigation from the suspected individual should be directed to the Investigation Unit.

- 3.7** The whistleblower committee shall not contact the suspected individual in an effort to determine facts or demand restitution, or discuss the case, facts, suspicions or allegations with anyone unless specifically asked to do so by the Investigation Unit.
- 3.8** Upon the completion of the investigation, the Investigation Unit will issue reports of its findings and suggested action plan to the Whistleblower Committee. The suggested action plan will be reviewed by the Whistleblower Committee before being carried out. Any records will be confidential and kept by the Whistleblower Committee.
- 3.9** The Investigation Unit shall treat all information in relation to the investigation confidentially. This is important in order to avoid damaging the reputation of persons suspected but subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability.
- 3.10** The identity of the whistleblower shall be kept confidential. GCB prohibits any form of retaliation against whistleblowers.

**4.0 VERSION HISTORY**

Version	Author	Date	Changes
V1.0	Corporate Governance Committee	11/08/2021	Creation of Whistleblower Procedure
V1.1	Corporate Governance Committee	31/03/2023	Changed member of Whistleblower Committee and added in the list of subsidiaries covered by this Procedure
V1.2	Corporate Governance Committee	03/12/2024	Update the scope of the procedures to include local communities.

### Appendix 1: Whistleblower Committee List

1. Whistleblower Committee list:

- Ms. Ang Nyee Nyee;
- Mr. Ng Kim Hian;
- Mr. Alan Tay; and
- Ms. Elsa Tay.

Appendix 2: List of all GCB's subsidiaries

