

SUPERMAX CORPORATION BERHAD (420405-P)

WHISTLEBLOWING POLICY & PROCEDURE

1.0 POLICY

Supermax Group's whistle blowing policy is aimed at protecting the integrity, transparency, impartiality and accountability where Supermax Group conducts business operations. The whistle blowing policy provides a structured reporting channel and guidance to all employees and external parties to whistle blow without the fear of victimization

2.0 PREAMBLE

Supermax Group conducts business based on the principle of fairness, honesty, openness, decency, integrity and respect.

The Group's internal control and operating systems are intended to detect and to prevent or deter improper or illegal activities. However, even the best system of control cannot provide absolute safeguard against irregularities, improper or illegal activities.

The Group, therefore has the responsibility to investigate and report to appropriate parties, allegation of suspected improper or illegal activities and take appropriate actions.

Hence, employees and third parties are encouraged to use the guidance provided by the Whistle blower Policy to report all allegation of suspected misconduct, irregularities or improper and illegal activities.

3.0 SCOPE AND OBJECTIVES

The procedures govern the reporting and investigation of improper or illegal activities at Supermax Group as well as the protection offered to the "whistle blower".

It, however, does not apply or change the Company's policies and procedures for individual employee grievances or complaints relating to job performance, terms and conditions of employment, which will continue to be administered and reviewed by Supermax Group Human Capital, Operations and Administration Department.

4.0 DEFINITIONS

4.1 Whistleblower

A person making a protected disclosure about improper or illegal activities is commonly referred to as a whistle blower. The whistle blower maybe Supermax Group employees, applicant for employment, vendors, contractors, customers or general public.

The whistle blower's role is as a reporting party. They are not, investigators or finders of facts, nor do they determine the appropriate corrective or remedial action that may be warranted.

4.2 Good faith

Good faith is evidence when a report is made without malice or consideration of personal benefit and the whistle blower has a reasonable basis to believe that the report is true, provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

4.3 Misconduct / Improper Activity

Example of misconduct includes, but not limited to theft, corruption, breaches, fraud including financial fraud and accounting fraud, behavior that is not in line with the Company value, attempted acts of interference, retaliation, threats, reprisal, coercion or intimidation, violation of law and regulations, unethical behavior or practices, endangering to public health or safety, violation of Company's policies, and negligence of duty alike.

5.0 PROCEDURES

5.1 General guidance

The Company presumes that whistle blowers will act in good faith and will not make false accusation when reporting of misconduct by the Company's employees.

5.2 Reporting allegation of misconduct or improper activities

- Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company, the Company customers, shareholders, employees, investors or the public at large.
- Acts of misconduct may be disclosed in writing, in person telephonic ally. However, all reports are encourage to be made in writing, so as to assure a clear understanding of the issues raised.
- Individuals are recommended to self identify, though it is not a requirement.
- All reports can be sent directly to the Chief Executive Officer, Executive Director, Director, Chairman of the Audit Committee, Head of Human Capital Department, and Head of Internal Audit Department.

The common contact address is as detailed below :- Lot 38, Putra Industrial Park, Bukit Rahman Putra, 40160 Sungai Buloh, Selangor Darul Ehsan.

In case of reports sent through email, it is recommended to use the contact address detailed below:-

whistle@supermax.com.my

Although the whistle holder is not expected to prove the truth of an allegation, he or she needs to demonstrate to the person contacted that there are sufficient ground for concern.

- 5.3 Investigation On Alleged Misconduct Or Improper Activities Any report received by a director, the Company officials, or employee should be forwarded immediately to the Chief Executive Officer.

Should a report involves or implicates the Chief Executive Officer, the Chief Executive Officer will promptly refuse himself from the investigation and inform the Chairman of the Audit Committee in writing. The Audit Committee may thereafter promptly appoint impartial attorneys to investigate the report. Those attorneys will conduct an investigation of the report and report their conclusion to the Audit Committee consistent with the Whistle blowing Policy.

6.0 PROTECTION OF WHISTLEBLOWERS PROCEDURES

Consistent with the policies of the Company, the Chief Executive Officer, the Audit Committee, the directors and the Company's management will not retaliate or attempt to retaliate, and will not tolerate any retaliation or attempted retaliation by any other person or group, directly or indirectly, against anyone who, in good faith, makes a report or provided assistance to the Chief Executive Officer, the Chairman of the Audit Committee or the Company management or any other persons or group, including any governmental, regularity or law enforcement body, investigating or otherwise helping to resolve a report.

7.0 RECORDS

The Head of Human Capital Department will retain on a strictly confidential basis for a period of 7 years all records relating to any report and the investigation to its resolution. All such report are classified privileged and confidential.