



WHISTLEBLOWING POLICY

SILVER RIDGE GROUP OF COMPANIES

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POLICY STATEMENT

SILVER RIDGE is committed to the standard of integrity, openness and accountability in the conduct of its operations and businesses. The Company desires to conduct its business activity in a transparent manner with a law-abiding spirit while being ethically responsible.

OBJECTIVE OF THE POLICY

The Whistleblowing Policies aims to:

1. Establish a robust, transparent and accountable communication channel for Employees and Stakeholders of the Company to voice their concerns in an effective, responsible and secured manner when they become aware of actual or potential wrongdoings that will cause the Company to be lacking in the Company's social and corporate responsibilities; and
2. Enable the Company to take fast, fair and effective corrective actions to comply with the Company's social and corporate responsibilities and maintain the support of trust of Employees and Stakeholders.

DEFINITIONS

In this Whistleblowing Policy, the following terms have the following definitions:

“Code of Conduct” means Peraturan Etika Kerja, Kelakuan & Tatatertib;

“Employees” means all board of directors, executive officers, members of management, regular employees and contracted employees having employment relationships with the Company, as

well as temporary staff and seconded employees working under the control and supervision of our Company;

“Employee Grievances” applies to personal dissatisfaction or complaints by Employees that are related to their employment and working conditions;

“Stakeholders” means third party suppliers, contractors, agents, consultants, distributors, customers and such other business partner which has direct or indirect business dealings with the Company;

“Whistleblowing Governance Group”

“Whistleblowing Investigation Team”

“Whistleblowing Policy” or “Policy” means this whistleblowing policy, including any subsequent revisions and supplemental guidelines.

SCOPE AND APPLICATION

1. This policy provides a system that enables the Company’s Employees and Stakeholders acting in good faith to raise concerns and disclose actual or potential wrongdoings or misconduct of the Company. These wrongdoings or misconduct include but are not limited to
 - i.) Violation of laws and regulations,
 - ii.) Unethical behavior or breach of Code of Conduct
 - iii.) Giving, solicitation or acceptance of bribes
 - iv.) Acts that adversely affect the interests or values of shareholders and Stakeholders

- v.) Unauthorized disclosure or sale of Company information
 - vi.) Falsification of reports and documents
 - vii.) Fraud, theft, embezzlement or misuse of company assets
 - viii.) Improper or undesirable personal behavior or misdeeds which seriously impacts the Company's business or reputation
 - ix.) Sexual or other forms of harassments in the workplace
 - x.) Attempts to cover any of the aforementioned.
2. The above list is not exhaustive and includes any act or omissions, which if proven, will constitute under "Code of Conduct" or any criminal offense under relevant legislations in force.
 3. Employees and Stakeholders who raise their concerns in good faith in accordance with Policy are protected from reprisals within the limits of the Law and assured that all reported cases will be objectively investigated on a best effort basis and appropriate remedial measures taken where warranted. This Policy is not intended to restrict or otherwise govern legal rights and obligations which Employees and Stakeholder have, or may have, in relation to the subject matter of the whistleblowing report.
 4. This Policy is not intended for Employees to lodge Employee Grievances or appeal on disciplinary procedures. Employees can report Employee Grievances or lodge appeals on disciplinary procedures through our Company's Human Resource and Admin Department (HRAD).
 5. Employees and Stakeholders should exercise due care to ensure that the information in their whistleblowing report is accurate and truthful. No action will be taken against Employee and Stakeholders who make an allegation in good faith which is not confirmed by subsequent investigation. But this protection may be revoked if Employees and Stakeholders misuse or abuse the Whistleblowing Policy by making false, frivolous, malicious or vexatious allegations.
 6. Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the

Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

HOW TO MAKE A WHISTLEBLOWING REPORT

1. Employees and Stakeholders should report their concern at the earliest opportunity so that corrective action can be taken as soon as possible.
2. The monitoring and execution of this Whistleblowing Policy will be placed under the supervision of the Whistleblowing Governance Group comprising the following:
 - a. Members of our company’s Audit Committee; and
 - b. Managing Director of our Company
3. The Audit Committee Chairman shall be the chair for the meeting of the Whistleblowing Governance where a quorum of no less than two (2) members are present and in his absence, another member of the Audit Committee shall be the chair.
4. Where any member of the Whistleblowing Governance Group is the subject of the investigation, the member will be recused from attending any meeting of the Committee.
5. Employees and Stakeholders have the option to make whistleblowing reports in strict confidence through any of the following channels:

Reporting Mode	Contact Details
Letter	Silver Ridge Holdings Berhad 4-6, Jalan 28/70A, Desa Sri Hartamas, 50480, Kuala Lumpur MALAYSIA
Online Submission	Whistleblowing Report Form
E-mail	TBA

6. Employees and Stakeholders making a whistleblowing report should disclose their full name, NRIC/passport number and/or Employee number (if applicable), as well as contact details such as telephone number and email address. This will enable our company to accord the person making the whistleblowing report necessary protection under this Policy and also obtain more details pertaining to the whistleblowing report.
7. Whistleblowing reports should include the following disclosures
 - (a) Background and history of the concern (giving relevant dates)
 - (b) Reason for the concern
 - (c) Identity of the person(s) committing the alleged wrongdoing

Insufficient details in the whistleblowing report may impede the investigation and resolution of the concerns raised.

WHISTLEBLOWING INVESTIGATION

1. Upon receipt of the whistleblowing report, the Whistleblowing Governance Group will as soon as practicable establish a Whistleblowing Investigation Team comprising appropriate and suitably qualified personnel to investigate the concerns disclosed in the whistleblowing report in a fair and objective manner and at its discretion, consider involving any other or additional officer of the Company and/or Committee and/or an outside Agency for the purpose of investigation. The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact finding process. If the Whistleblowing Investigation Team finds that the alleged wrongdoing or misconduct is true, our company will take appropriate actions including disciplinary action, termination of contract and establishing new controls to prevent recurrence of the wrongdoing or misconduct in our Company.
2. A member of the Whistleblowing Governance Group or an officer appointed by the Whistleblowing Governance Group will within 30 working days, contact the person who submitted the whistleblowing report to
 - 2.1. Acknowledge that the report has been received, and
 - 2.2. Indicate how the report will be dealt

3. The whistleblowing Governance Group will keep a record of all steps taken in response to each whistleblowing report received as well as how the concerns raised were resolved.
4. The whistleblowing Governance Group will report their findings to the Audit Committee and Board of Directors.

CONFIDENTIALITY AND SAFEGUARDS

1. All whistleblowing reports will be treated as confidential to the extent reasonably practicable. The identity of the Employee and Stakeholder who submitted the whistleblowing report may be kept confidential so long as it does not impede or frustrate investigation. The investigation process may also reveal the source of the information and the Employee or Stakeholder who raised the concern may be required to provide a statement as part of the evidence.
2. The Whistleblowing Policy offers protection within limits of the law and to extent reasonably practicable to Employees and Stakeholders who submit whistleblowing reports internally in good faith, even if the allegations prove to be unfounded or mistaken. These Employees and Stakeholders will be appropriately protected from internal disciplinary actions (If applicable), dismissal, harassment, victimization or informal pressures. No protection from internal disciplinary action will be offered if Employees do not adhere to the procedures for whistleblowing and disclosures in this Policy.

This Whistleblowing Policy may be updated or amended from time to time by Silver Ridge Group of Companies.

WHISTLEBLOWING REPORT e-FORM

CONTACT INFORMATION	
NAME	
IC/PASSPORT NO:	
CONTACT NUMBER	(HP)
	(O)
E-MAIL ADDRESS	
DISCLOSURE	
<p>Please include (i) background and history of concern (giving relevant dates), (ii) reason of concern, and (iii) identity of the person(s) committing the alleged wrongdoing. Insufficient details in the whistleblowing report may impede</p>	

I have read and understood the Whistleblowing Policy. I affirm that all information submitted in my whistleblowing report is true to the best of my knowledge and agree to extend my full cooperation to Silver Ridge Group of Companies in their investigation of my complaint.