

Whistle Blower & Anti-Corruption

WHISTLE BLOWING POLICY AND GUIDELINE

The Management of Encorp is committed towards ensuring no compromise in any form or practice of wrong doing, bribery, conflicts of interest, breach of authority, abuse of power and misappropriation to ensure that all business decisions and processes are effective, efficient and free from any element of misconduct without fear.

The Whistle Blowing Policy and Guideline is intended to support one of Encorp's core values on Ethics and Governance requirements. Encorp places high value of trust to ensure that all business operations and decision making are carried out with Encorp's high standards of integrity and good governance to avoid any misconduct that may affect the organisation.

All stakeholders are encouraged to report genuine concerns on misconduct which refers to breach of legal obligation, injustice, danger to health, safety and environment and cover up of any of the mentioned in the work place.

1. Use of the Whistleblowing Policy and Guideline

1. The document applies to all Encorp's Board of Directors, Management and stakeholders.
2. The document should be read in conjunction with the Code of Conduct and Business Ethics, Anti Bribery and Corruption Guideline and any policies, rules and procedures and applicable laws in Malaysia.

2. Making a Report and Channel of Communication

- The complainant should report immediately if they have a reasonable belief that a wrongdoing has been, is being or is believed to have committed a wrongdoing.
- The complainant is encouraged to make a report via the following methods:
 - Meet or contact any Risk and Governance Department staff to make a report; and
 - In writing and delivered either by hand or mail at the following address to:
The Chairman of Audit and Risk Committee, Encorp Berhad
45G Jalan PJU 5/21. The Strand Encorp. Pusat Perdagangan Kota Damansara , Kota Damansara, PJU 5, Petaling Jaya, Selangor.
Email: whistleblowing@encorp.com.my
- Reports of misconduct shall be made with the intention of good faith, not false, malicious or defamatory. The report shall be based on facts with evidence and not speculative.

- Protection will be given to business partners or any member of the public who report misconduct under this policy subject to the fairness and where appropriate.
- In case reports of misconduct made against any member of the Board of Directors or Management, the member or officer concerned cannot be equally involved in the overall process described in this Policy or make any action or a decision on the report. Any tasks and responsibilities of the member or employee shall be assumed by a member or other employee as authorised.
- Any anonymous disclosures will not be entertained. An Employee or member of the public who wishes to make a report on improper conduct is required to disclose his/her identity to the Company in order for the Company to assign the necessary protection. However, the Company reserves its right to investigate into any anonymous disclosure.

3. Confidentiality and Protection

- All reports of misconduct are characterised and classified as CONFIDENTIAL. Content of the report may not be disclosed to any party other than the party entitled to know as law enforcement agencies, Investigation Team, Member of the Board for investigation, assessment and decision making. However, the identity of the complainant will be kept confidential and protected and shall not be expressed in any document or statement.

ANTI-BRIBERY AND CORRUPTION

Bribery is requesting or receiving anything of value or any advantage, whether directly or indirectly, from any person, intending that, as a consequence, a relevant function or activity should be performed improperly, whether by employee or another person.

1. Responsibility

- **Staff responsibilities**
 - The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the ENCORP and its subsidiaries.
- **Management Commitment**
 - The management of Encorp is committed towards preventing bribery and corruption practices by fostering a culture in which bribery or corruptions practice is unacceptable. Management of Encorp shall also ensure compliance to all applicable rules and regulations pertaining anti-bribery and corruption.

2. Guideline when dealing with issues of potential bribery and corruption

- **Decline**
 - Any individual offered, given or requested of a bribe shall take action by refusing the offer, gift or demand of such bribe.

- **Report**

- The complainant should report immediately if there is a reasonable belief that bribe has been, is or is likely to occur.
- The complainant is to make a report via the following channel:
 - Meet or contact any Board of Director or Audit Risk and Governance Committee to file a report;
 - Submit in writing by hand, post or email at the following address:
 1. Audit & Risk Committee, Encorp Berhad, 45G Jalan PJU 5/21, The Strand Encorp, Pusat Perdagangan Kota Damansara, Kota Damansara PJU 5, Petaling Jaya, Selangor.
 2. whistleblowing@encorp.com.my

3. Silence

- Any individual who has made a report on corruption offenses and misappropriation shall not disclose such reporting to any other person.

CODE OF CONDUCT AND BUSINESS ETHICS GUIDELINE

The Code of Conduct and Business Ethics is to provide guidance and set common ethical standards to promote consistency in behavior across all levels of employment and management.

1. Responsibilities as Employees of ENCORP

All Encorp group employees are responsible for upholding the highest standards when acting on Encorp's behalf. Encorp expects all its members to act with integrity in everything they do. Beyond just conducting yourself with integrity, you have a responsibility to help protect the group from legal and ethical hazards, including misconduct by other members of the Encorp Group. The Encorp group will benefit most if you help identify legal and ethical risks before they become actual problems.

2. Core Values and Culture

Adherence to the principles of discipline, good conduct, professionalism, loyalty, integrity and cohesiveness is critical to the success and well-being of the Encorp group. In this regard, Encorp is committed to the highest standards of integrity, openness and accountability in the conduct of the group's business and operations. All Encorp employees have the duty to act with good faith, fidelity, diligence and integrity in the following matters:

1. Conflict of Interest

- Conflict of interest generally arises when you are in a position to take advantage of your role at Encorp for your personal benefit, including the benefit of your

family/household and friends, by placing your personal, social, financial or political interests before the interests of Encorp. You are generally expected to avoid conflicts of interest, and situations that have the potential to generate conflicts of interest.

2. Solicitation, Bribery and Corruption

- The Code prohibits Encorp employees from directly or indirectly soliciting, accepting or offering bribes to or from government officials or private individuals / organisations. Contractors, sub-contractors, consultants, agents, representatives and others acting for or on behalf of Encorp are expected to comply strictly with Encorp policies prohibiting improper solicitation, bribery and corruption.

3. Gift and Entertainment

- All gifts or entertainment received by you or members of your family from Encorp contractors, sub-contractors, suppliers, consultants, bankers, dealers or customers, whether actual or potential, regardless of value, must be reported to Encorp in accordance with Encorp policy and procedures on the receipt of gifts and entertainment.

4. Money Laundering

- Encorp strongly opposes money laundering and other activities that involve dealing in the proceeds of criminal activities. You may not knowingly deal with criminals or the proceeds of crime. You must report of suspicious transactions or suspected incidents of money laundering or bribery The Code provides further guidance with regard to how to deal with and combat possible money laundering situations.

5. Assets of Encorp

- It is employee's responsibility to safeguard those assets, taking all necessary steps to prevent loss, damage, misuse or theft. Encorp assets may not be misused, taken, sold, lent, given away or otherwise disposed of, or used for personal purposes, except in accordance with appropriate authorisation from Encorp.

6. Financial Integrity

- Encorp' books and records must be prepared accurately and honestly. Fair and accurate books and records are essential to managing the group's businesses correctly and to maintaining the integrity of the group's financial reporting and disclosure. You are required to comply with all policies and procedures established to safeguard and support the integrity and accuracy of Encorp' books and records and financial reporting.

7. Workplace Culture and Environment

- Encorp is committed to providing, in collaboration with you, a safe, secure and conducive workplace culture and environment, where the values of mutual and reciprocal respect, trust and confidence are upheld and actively promoted.

8. Misconduct

- In general, you may be subject to disciplinary action for misconduct. The Code defines misconduct as improper behaviour or an act or conduct in relation to duties or work which is inconsistent with the due performance of obligations to Encorp.