

Iskandar Investment Berhad

WHISTLEBLOWING PROGRAM AND POLICY

Policy Number : IIB-RSK-R-POCY-WBPP-0001-R00
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Authority : Board of Directors
Contact Officer : Sharina Mohd Yusof

IIB RESTRICTED

Revision History

Revision	Amended by	Authorized by	Approved by	Revision Date
1.0	Farid Izwan Mohd Japar		Sharina Mohd Yusof	13 June 2022

Change History

Revision	Change Details
1.0	Minor changes to the new address of IIB's office and Whistleblowing hotline number.

Related Documents - Procedure

Document Number	Title
	Code of Conduct
IIB-HCM-R-PoCY-HCMP-001-R00	Human Resource Policy

1. OVERVIEW

Iskandar Investment Berhad (“IIB”) has adopted a Code of Conduct policy that describes the standards of behavior and business conduct required from its staff. The code defines specific guidance and references to assist staff in maintaining high ethical business standards and the way of how IIB conducts its business in a manner that is efficient, effective and equitable. IIB is also committed to maintaining an effective internal control environment to detect and to prevent/deter improper activities or conducts, as well as ensuring accuracy of financial reporting and related disclosures. However, the effective internal controls could not provide absolute safeguards against any irregularities (intentionally or unintentionally), malpractices, misdemeanor or violations of laws, regulations, policies and procedures. It is the company responsibility to investigate and address allegations of suspected breaches of code of conduct, misdemeanors or fraudulent or wrongful or improper activities.

The Whistleblower Program and Policy document serves to provide a channel for the staff or outside parties to raise concerns, expose irregularities, help uncover malpractices, prevent frauds, eliminate personnel harassments and attend to grievances to those associated without any fear of reprisal or adverse consequences. It sets out the procedures for lodging or raising of complaints/concerns by staff and outside parties, handling of the complaints/concerns, reporting requirements, and periodic monitoring of the program.

2. DEFINITIONS

Allegations – Statement that has not been proved with evidence that someone has done something wrong or illegal.

Fraud - Intentional twisting of the truth or concealment of facts or methods of illegally getting money from someone or from company.

Improper Conduct or Wrongdoing - For the purpose of this policy, improper conduct or wrongdoing is defined as:

- corrupt conduct / bribery / accepting kickbacks;
- fraudulent activity
- a substantial mismanagement of IIB resources or abuse of power or authority
- non-financial allegations such as sexual or racial harassment
- a criminal offence;

Protected Disclosure - defined as any communication in good faith based on reasonable grounds that discloses or demonstrates an intention to disclose information that may evidence a wrongdoing or improper conduct.

Whistleblowing - defined as "The deliberate, voluntary disclosure of individual or organizational malpractice by a person who has or had privileged access to data, events

or information about an actual, suspected or anticipated wrongdoing within or by an organization that is within its ability to control."

Whistleblowing Secretariat - An operationally independent unit established within the Internal Audit Department for receiving, handling and monitoring allegations, complaints and concerns raised by the whistleblower.

Whistleblower – or “concerned individual” is defined as any employee, director, related officer, contractor, service user, customer or any member of public, who makes or attempts to make a disclosure of improper conduct or wrongdoing.

3. WHISTLEBLOWING SECRETARIAT

Whistleblowing secretariat shall be established under the purview of Audit and Risk Committee (“ARC”) of IIB. This operationally independent unit which functionally reporting directly to the Chairman of ARC is established as secretariat for receiving, handling and monitoring allegations, complaints or concerns raised by the whistleblower.

4. PROCEDURES OF LODGING/RAISING COMPLAINTS OR CONCERNS

Parties to Whistleblowing

The following are the parties to the Whistleblowing program:

- Any employee, as Whistleblower
- Any outside party, including shareholders, auditors, contractors, investors, customers, vendors, etc., as Whistleblower
- Whistleblowing Secretariat – handling complaints/concerns raised or allegations against malpractices, wrong doings, fraudulent activities.

Whistleblowing activities & disclosures

The followings are to be reported to the Chairman of ARC via Whistleblowing Secretariat:

- Allegations of suspected fraudulent activities, breaches of Code of Conduct, wrongdoings, or improper conduct by IIB staff
- Allegations of suspected wrongdoings or complaints or concerns relating to the IIB’s accounting, internal controls, auditing or financial reporting matters

Whistleblower or “concerned individual” should channel the Reports/Concerns/Complaints/Allegations to Whistleblowing Secretariat or to the Chairman of ARC via secured communication channels. In the event, the allegation is against the person(s) in the Whistleblowing Secretariat, the Reports / Concerns / Complaints / Allegations should be directed or raised promptly to the Chairman of ARC.

Reports/Concerns/Complaints/Allegations are to be made in writing or verbal and should be factual rather than speculative, and contain as much specific information as possible including:

- Background of the information of the concern or complaint
- The name(s) of the staff involved including witness if any
- Dates or period of the alleged incident or events
- Perception of why suspecting fraudulent act, wrongdoing or improper conduct
- Action taken if any and the outcome

5. SECURED COMMUNICATION CHANNELS

Staff or outside parties with complaints or concerns may report such complaints or concerns through Whistleblowing hotline, email, or regular mail. Complaint or concern should be submitted once only through the following modes of communication:

Hotline – +6019 7271 900
Email – IIB.Concerns@my-iib.com

Regular Mail – *Peti Surat 91, 80710 Johor Bahru, Johor*

Staff or outside parties could also forward their complaints or concerns in writing and submit it in sealed envelope (to be opened by addressee only) at the following address:

**Chairman
Audit & Risk Committee
c/o Iskandar Investment Berhad
A18 & A19, Medini 9, Persiaran Medini Sentral 1,
Bandar Medini Iskandar Malaysia,
79250 Iskandar Puteri, Johor Darul Ta'zim**

6. HANDLING WHISTLEBLOWING COMPLAINTS/CONCERNS

- 6.1 All reports (in writing or verbal) received by the Whistleblowing Secretariat are to be logged into a tracking report (register) and assigned with reference code that will be used in the investigation and reporting of the allegation. Access to files and reports is to be strictly restricted.
- 6.2 The reports together with the register shall be forwarded to the Chairman of ARC. Initial inquiries / assessments will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.
- 6.3 Upon satisfaction of the wrongdoing or malpractice or improper conduct are substantiated with information or evidence that are sufficiently specific and contain adequate corroborating evidence that warrant investigation, the Chairman of ARC in his discretion will decide on how to proceed with dealing with the allegation or concern or complaint. He could direct the President/Chief

Executive Officer or Internal Audit Department or External Auditor to investigate the allegation or wrongdoing or malpractice.

- 6.4 The need for confidentiality of all participants in the investigation must be honored to the extent possible.
- 6.5 Investigators must be competent, trained, independent, unbiased, objective, and ethical, and observe legal and professional standards.
- 6.6 The complainant will be given the opportunity to receive follow-up on his / her concern within five days:
 - Acknowledging that the concern was received;
 - Indicating how the matter will be dealt with;
- 6.9 The investigation report with the recommendation for the next course of action to be taken will be submitted to the ARC. The ARC will review and assess on the investigation report and recommend a course of action in a prompt and fair manner.
- 6.10 The investigation report will then be forwarded to Human Capital Management in case disciplinary action is required against the delinquent staff for necessary action.
- 6.11 The action taken by the company will depend on the nature and seriousness of the breach and on the degree of commitment shown by the party in breach to his or her obligation. The disciplinary action process will be in accordance with Human Capital Management policy and procedures.

7. PROTECTION RIGHTS OF THE WHISTLEBLOWERS

- 7.1 Commitment to protecting whistleblowers – IIB is committed to the protection of genuine whistleblowers against action taken in reprisal for making of protected disclosures.
- 7.2 Confidentiality – confidentiality of the whistleblower’s identity, the nature of the report and the suspected person’s identity is to be strictly maintained.
- 7.3 Keeping the Whistleblower informed – The Whistleblowing Secretariat will ensure the whistleblower is kept informed of action taken in relation to the disclosure made as per handling procedures.
- 7.4 Retaliation, Retribution, Harassment or Victimization – the decision to report a concern could be difficult to make because of the fear of reprisal from those responsible for the malpractices or wrongdoings. IIB will not tolerate harassment or victimization by anyone against the whistleblower or “concerned individual” who has, in good faith, sought out advice or has reported questionable behavior, malpractices, wrongdoing, improper conduct, or

possible violation. IIB will take disciplinary action up to and including termination of services for anyone who threatens or engages in retaliation, retribution or harassment of the whistleblower or “concerned individual”.

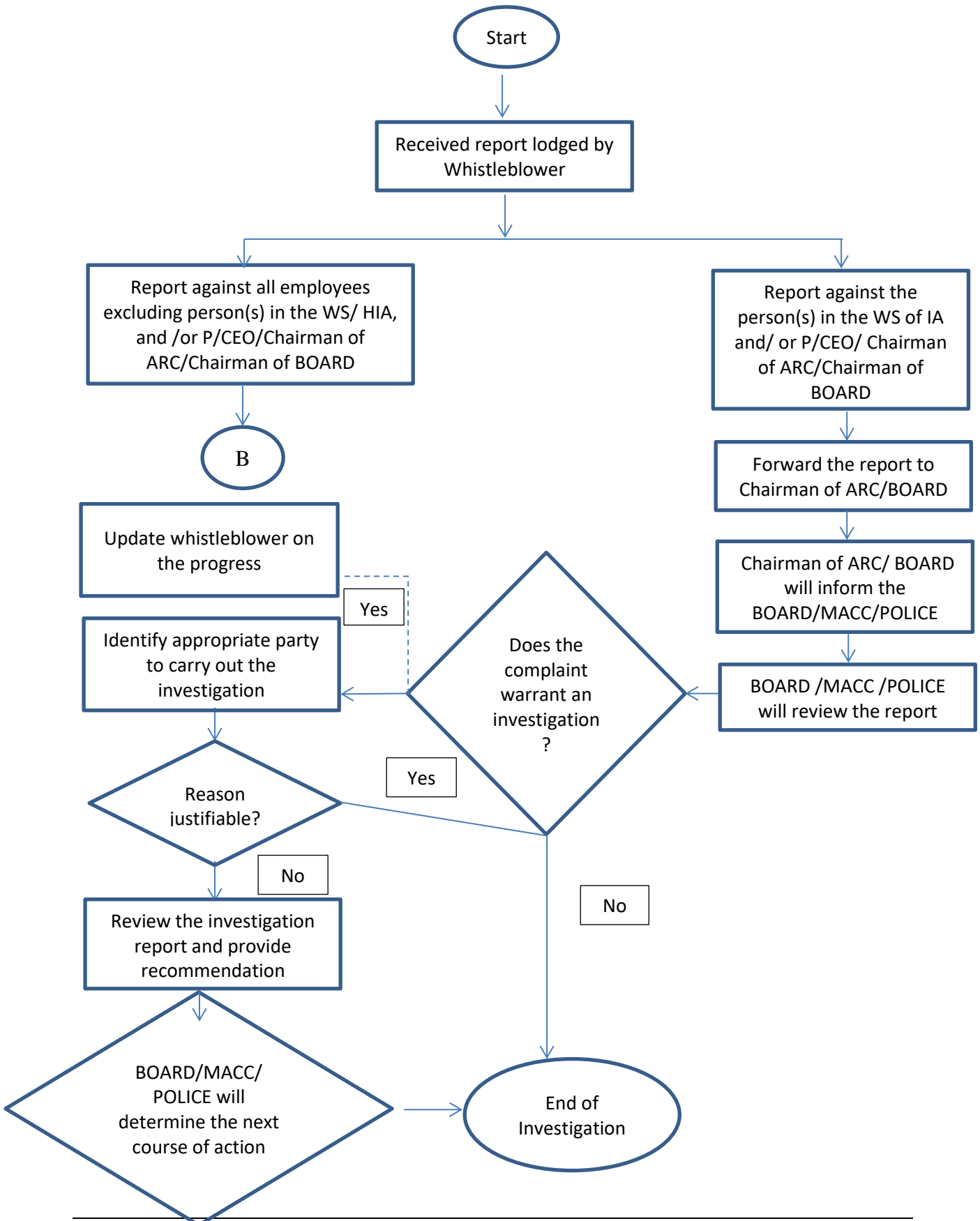
8. REPORTING REQUIREMENTS

- 8.1 At the conclusion of whistleblower investigation, a written report that provides the findings of the investigation including a summary of the evidence and conclusion as to whether or not the allegations are substantiated is to be completed and issued to the ARC.
- 8.2 ARC shall have the authority to obtain briefing regarding any investigation of a complaint or concern raised and any findings relating to the complaints or concern raised.
- 8.3 A tracking register documenting all whistleblower allegations and actions taken to resolve them will be submitted to the ARC quarterly and to the Board annually.
- 8.4 Record of all response letter, complaints and documentation (investigation and report) shall be properly maintained and kept for future reference.

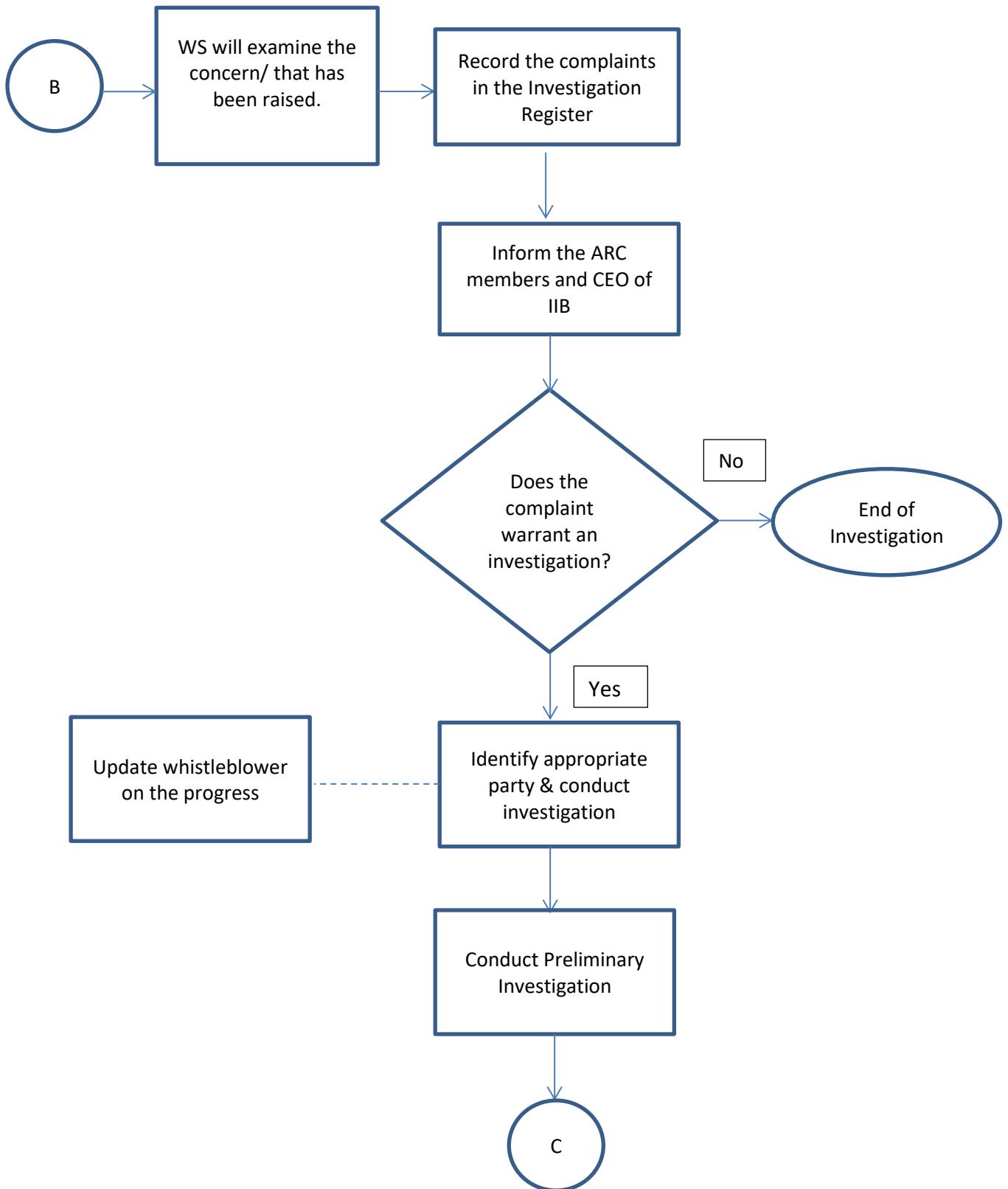
9. MONITORING & REVIEW OF POLICY

The ARC is responsible for monitoring the effectiveness and compliance with the Whistleblowing Program and Policy. The program and policy will be reviewed annually to ensure it complies with relevant laws and regulations and remains relevant and effective.

APPENDIX A: WHISTLE BLOWING REPORTING & DISCLOURE FLOW CHART



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