

DANCOMECH HOLDINGS BERHAD
REGISTRATION NO. 201301020455 (1050285-U)

WHISTLE-BLOWER POLICY

A. PURPOSE

This policy is intended for Dancomech Holdings Berhad (“DHB” or the “Company”) and all subsidiary companies within the Dancomech Group (the “Group”) (this “Policy”).

The Group is committed to fostering a culture of integrity and ethical conduct and will not tolerate any form of retaliation against individuals who report in good faith any known malpractices or wrongdoings involving the Group or its directors and employees (hereon referred to as “Concerns”).

All employees and other stakeholders of the Group as well as the members of the public play an important part in helping the Group to maintain the highest level of corporate ethics, and have a responsibility to disclose any Concerns.

B. SAFEGUARDS

A person or entity making a protected disclosure is commonly referred to as a “Whistle-blower”. Whistle-blowers provide initial information related to a reasonable belief that an improper activity has occurred.

The Group shall provide protection to Whistle-blowers provided that the disclosure is made in good faith and in accordance with this Policy. Such protection includes safeguards against dismissal, demotion, retaliation, or other adverse employment consequences, and DHB may consider mitigating circumstances if the Whistle-blower was involved in the reported activity. The Group reserves the right to withdraw the protection if the Whistle-blower is found to have knowingly made a false, misleading or malicious report.

A Whistle-blower’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

C. CONFIDENTIALITY

Every effort will be made to treat the Whistle-blower’s identity with appropriate regard for confidentiality. The Group assures that the identity of the Whistle-blower will not be disclosed to any third party or entity not involved in the investigation or prosecution of the matter, except where disclosure is required by law, including by order of a court of law.

D. PROCEDURES

D.1 Process for disclosure

I) Impropriety

This Policy covers:

- improprieties or irregularities (including financial and operational);
- suspected fraud or criminal offences;
- breach of confidentiality;
- abuse of power;
- bribery or corruption practices;
- any act or omission that may give rise to corporate liability under Section 17A of the Malaysian Anti-Corruption Commission Act 2009;
- criminal breach of trust;
- any form of discrimination and harassment;
- endangerment of an individual's health and safety; and
- failure to comply with legal or regulatory requirements.

II) Reporting

The Group may accept anonymous disclosures; however, Whistle-blowers are encouraged to identify themselves to enable a proper investigation and to qualify for protection under the Whistleblower Protection Act 2010. Anonymous reports will be assessed based on their seriousness and credibility, but the Group's ability to investigate, verify information, or provide feedback may be limited, and statutory protection may not apply.

Whistle-blowers shall report to the reporting person(s) as stated below on any allegations of suspected improper activities or employment-related concerns.

Concerns relating to improper, unethical or illegal activities, including financial reporting irregularities, may be reported directly to:

1.1 Chairman of Audit and Risk Management Committee ("ARMC")

Address : No. 19, Jalan Pelukis U1/46, Temasya Industrial Park, 40150 Shah Alam, Selangor Darul Ehsan

E-mail : fgong@gep.com.my

Employment-related concerns can be reported to:

1.2 Managing Director ("MD") and/or Executive Director ("ED")

Address : No. 19, Jalan Pelukis U1/46, Temasya Industrial Park, 40150 Shah Alam, Selangor Darul Ehsan

E-mail (MD) : daniel.aik.2@dancomech.com.my

E-mail (ED) : johnson.aik.2@dancomech.com.my

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Disclosures can be verbal or in writing and forwarded in a sealed envelope to the abovementioned contact person(s) labelling with a legend such as “*To be opened by the Chairman of ARMC, MD or ED only*”.

All disclosures must be made in good faith with a reasonable belief that the information disclosed is true and accurate at the time of reporting. Any Whistle-blower who knowingly makes a false, malicious, frivolous, or vexatious allegation may be subject to appropriate disciplinary action, up to and including termination of employment or contract, and may also face civil or criminal liability where applicable.

III) Handling of a reported allegation

The action taken by the Group in response to a report of Concern under this Policy will depend on the nature of the Concern. The Chairman of ARMC, MD or ED shall receive information on each report of Concern and follow-up information on actions taken.

D.2 Investigator

The Internal Auditor shall be the named Investigator unless the Chairman of ARMC assigns/appoints another Investigator. Investigators shall conduct inquiries impartially, independently, and in accordance with relevant laws and internal policies..

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of ARMC and, where appropriate, to the Board of Directors of DHB.

D.3 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some Concerns may be resolved without the need for investigation.

If an investigation leads to the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group’s Code of Ethics or Conduct, the results of the investigation shall be reported to the MD or the ED in accordance with the applicable procedures for company conduct and the administration of discipline. Any charges of misconduct brought as a result of an investigation under this Policy shall comply with established disciplinary procedures.

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E. MONITORING AND PERIODIC REVIEW OF POLICY

The Group will diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group and, if necessary, implement changes subject to the approval of the Board of Directors.

This policy will be reviewed periodically to assess its effectiveness.
