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Whistleblowing Policy

Policy Statement:

Hubline Berhad and its subsidiaries (collectively referred to as the “Group”) aspire to conduct its affairs in an ethical, responsible and transparent manner to promote best practice in corporate governance.

As such, the Board of Directors of Hubline Berhad has developed this Whistleblowing Policy (the “Policy”) in-line with the Whistleblower Protection Act 2010 to provide a structured reporting channel and framework to all employees and whistleblowers without fear of victimisation and/or subsequent discrimination.

This Policy should be read in conjunction with the following policies of the Group:

- The Anti-Bribery and Corruption Policy; and
- The Code of Conduct and Ethics.

Responsibility:

The Board of Directors will be responsible for the oversight and monitoring of this Policy.

The Audit Committee Chairman shall have overall responsibility for the implementation of this Policy.

Scope:

This Policy will apply to you if you are, or have previously been, any one of the following:

- An officer or employee of the Group;
- A senior executive, manager or director of the Group;
- An agent, associate, contractor or business partner of the Group; and
- A contractor, consultant, suppliers or service provider to the Group.

The Policy does not apply to personal work-related grievances or complaints concerning an employee's terms of employment and such matters shall be dealt with in accordance with the Group's human resources guidelines and procedures.

Anonymous complaints will not be entertained and covered under the Policy.

Objective:

The Policy is intended to assist employees or whistleblowers who believe they have discovered improper conduct or potential violations or concerns relating to relevant laws, rules, regulations, business ethics and conduct within the Group.

Where an employee or whistleblower discovers information which he or she believes shows improper conduct or potential violations or concerns within the Group then this information should be disclosed internally without fear of reprisal so that the Group can conduct an investigation and resolve the complaint.

An employee who whistleblows will be protected against victimisation or other adverse treatment provided that the whistleblowing is done in good faith.

However, any whistleblowing which is not made in good faith and is found to be deliberately falsified with malicious intent will be subject to disciplinary action by the Group.

Definition of Whistleblowing:

- Whistleblowing – when a person reports an improper conduct or potential violations or concerns that he or she is aware of based on his or her reasonable belief.
- Whistleblower – a person who discloses or reports the improper conduct or potential violations or concerns. The Whistleblower is not expected to prove the truth of the allegation but should, in making the report, have the reasonable belief that an improper conduct was committed, is being committed or will be committed.
- Improper Conduct – this includes among others, the following:
 - Breach of trust or duty;
 - Corruption, bribery or blackmail;
 - Criminal offences;
 - Dishonesty;
 - Endangerment of an individual's health and safety;

- Failure to comply with legal or regulatory obligations;
- Fraud;
- Insider trading;
- Money laundering;
- Misappropriation of funds;
- Theft;
- Unethical behaviour or practices;
- Any other action that may potentially cause considerable harm to the Group or to an individual; and
- Concealment of any or a combination of the above.

Requirement of Good Faith:

An employee or whistleblower filing a complaint concerning an improper conduct must act in good faith, exercise due care to ensure the accuracy of the information and has reasonable grounds for believing the information disclosed to be true.

If an employee makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that employee. If, however, an employee makes malicious allegations or disclose information which is knowingly to be false, disciplinary action may be taken against that employee.

Protection of Whistleblower:

The Policy is designed to offer protection to an employee or whistleblower who discloses such improper conduct provided the disclosure is made in good faith.

An employee who in good faith discloses an improper conduct will be protected from any reprisal (disciplinary action, harassment, retaliation, demotion, suspension or termination of employment or service) within the Group as a direct consequence of the disclosure.

Any such employee who believes he or she is being retaliated against must contact the Head of the Human Resources Department immediately.

An employee who retaliates against another employee who has reported an improper conduct in good faith is subject to disciplinary action including termination of employment.

Confidentiality:

The investigation of the alleged improper conduct would be carried out strictly in a confidential manner. The whistleblower and the alleged wrongdoer are expected to give his or her full co-operation in any investigation or any other process carried out pursuant to the Policy.

All information, documents, records and reports relating to the investigation of the alleged improper conduct shall be kept securely to ensure its confidentiality.

No Protection for Deliberate False Reporting:

If you make a malicious or false allegation under this Policy, you risk causing serious harm to the reputation of the Group and to individuals who are mentioned in false reports. If you make such an allegation deliberately (i.e. where you know it to be untrue), such conduct may be considered a serious matter rendering you subject to disciplinary proceedings and you may not be able to access the whistleblower protection.

However, if you reasonably suspect misconduct or have some information leading to a suspicion (but lack all the details) we encourage you to nonetheless come forward.

Reporting Procedures:

The whistleblower should immediately come forward with any information that he or she, in good faith and reasonably believes that an improper conduct was committed, is being committed or will be committed.

Any concerns should initially be reported to the immediate line manager or General Manager. However, if for any reason the whistleblower is reluctant to do so, then the whistleblower shall report the concerns in writing to the Audit Committee Chairman.

All letters and reports shall be communicated in writing which must be made directly to the Audit Committee Chairman via a sealed envelope marked as "Confidential".

In order to carry out an investigation, the whistleblower is required to disclose his or her name and contact telephone numbers, which will be kept confidential.

Additional information required to facilitate the investigation that should be included are as follows:

- a. Time, date and location of the incidence;
- b. The identity of the alleged wrongdoer;
- c. Nature of the alleged improper conduct;
- d. Particulars of witnesses, if any;

- e. Particulars or production of documentary evidence, if any;
- f. Other details deemed to be useful to facilitate screening and action to be carried out.

The Audit Committee Chairman will screen and assess the whistleblower's disclosure to determine whether it constitutes an improper conduct or is excluded from the scope of the Policy. The whistleblower may be required to provide additional information and clarifications if the need arises.

The Audit Committee Chairman will, as soon as reasonably possible, nominate an appropriate investigation officer who is without any conflict of interest.

Based on the initial findings, the Audit Committee Chairman will instruct the investigation officer on the next course of action.

The investigation process aims to achieve the following objectives:

- To gather relevant information in the most appropriate manner and to protect the information or document from sabotage or compromise;
- To ensure that the proper procedures are carried out in the process of the investigation; and
- To arrive at a fair judgment and recommendation on the allegation.

The investigation officer shall prepare and submit a report which contains the findings of the investigation, among other things, to the Audit Committee Chairman.

A final report will be tabled to the Audit Committee who will review the report and decide on the disciplinary action to be taken, based on the human resources guidelines and procedures. This may amongst others, include a formal warning, reprimand, suspension or termination of employment with the Group.

A final report with the Audit Committee's recommendation will be tabled to the Board of Directors who will review the report and decide on the disciplinary action to be taken.

In all cases where possible, the management shall institute the appropriate control measures to prevent any further improper conduct or damage to the Group.

Subject to legal constraints, the whistleblower and the alleged wrongdoer will be notified of the outcome of the investigation.

If the whistleblower is dissatisfied with the outcome of the investigation, the whistleblower may submit another detailed report explaining why this is the case and the concern will be investigated again if there is good reason to do so.

Furthermore, the whistleblower is at liberty to take the matter further by raising it with the relevant governmental, regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act 2010.

Review:

The Board of Directors may modify the Policy at any time without any notice.

Modification may be necessary, amongst others, to maintain compliance with rules and regulations as well as to accommodate organisational changes within the Group.

Any revision or amendment to the Policy will be communicated to all employees of the Group.

This Policy was updated by the Board of Directors on 26 June 2020.