
WHISTLEBLOWING POLICY

1. INTRODUCTION

LBS Bina Group Berhad (“**LBGB**” or “**Company**”) is committed in promoting high standard of integrity and accountability as well as good Corporate Governance practices in managing its day-to-day businesses and operations. The Company also aims to conduct its affairs in an ethical, responsible and transparent manner.

2. OBJECTIVES

This Policy is to provide an avenue for all employees of the Group and members of the public to disclose any improper conduct in accordance with the procedures under this Policy and to provide protection for them who report such allegations.

The Policy is designed to support to the following:

- a) Be committed to the Company's business ethics of honesty, integrity and transparency;
- b) To provide a transparent and confidential process for all parties to give information on non-compliances to the Code of Ethics and Conduct, or any misconduct regardless of his or her position, to an independent party to investigate the allegations and take the appropriate actions; and
- c) To uphold the moral duty being a Company by protecting the interest of all its stakeholders.

3. SCOPE

This Policy applies to all matters involving the Group's employees and any other stakeholders of the Group including consultants, vendors, independent contractors, external agencies and/or any other party with business relationship with the Group.

This Policy does not apply to grievances concerning an individual's term of employment and such matters shall be dealt with in accordance with Group Human Resource guideline and policies. Should it be determined during the preliminary investigation that the matter disclosed does not fall within the scope of this Policy, such matters will be transferred and dealt with by the appropriate personnel of the relevant department for appropriate procedures and actions to be taken.

4. DEFINITIONS

“**Confidential Information**” shall include without limitation to the following:

- a) information about the identity, occupation, residential address, work address or whereabouts of a whistleblower and a person against whom a whistleblower has made a disclosure of Improper Conduct;
- b) information disclosed by a whistleblower; and
- c) information that, if disclosed, may cause detriment to any person.

“**Disciplinary Offence**” means any action or omission which constitutes a breach of discipline in the Group as provided by law or the Group's code of conduct, policies and/or contract of employment, as the case may be.

“**Improper Conduct**” is any conduct which if proved, constitutes a Disciplinary Offence or a criminal offence. Improper Conduct includes, but not limited to, the following:

- a) Fraud;
- b) Bribery;

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- c) Abuse of Power;
- d) Conflict of Interest;
- e) Theft or embezzlement;
- f) Misuse of the Group's Property; and
- g) Non-compliance with procedure.

5. LIMITATIONS

This Policy does not however, cover any issues, complaints or concerns in relation to matters:-

- a) which are grievance, trivial or frivolous in nature;
- b) which are motivated by malice;
- c) pending or determined through the Group's disciplinary proceedings; and
- d) pending or determined through any tribunal or authority or court, arbitration or other similar proceedings.

Any anonymous disclosure will not be covered under this Policy.

If a whistleblower is unsure whether a particular act or omission constitutes an Improper Conduct under this Policy, he or she is encouraged to seek advice or guidance from his or her superior or Head of Human Resource Department.

6. CONFIDENTIALITY

All whistleblowing reports are treated as confidential and not to reveal the whistleblower's identity unless such disclosure is required by law. The whistleblower is to be given an assurance that his/her identity will be only known by a few top management on a need to know basis and the outcome of the investigation will be fed back to the whistleblower. This is to encourage and give confidence to the whistleblower that the case will be investigated.

7. PROTECTION

This Policy provides assurance that the whistleblower, if an employee of the Company, shall be protected against reprisals or retaliation, and immunity from disciplinary action from the whistleblower's immediate supervisor or department head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:

- a) only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;
- b) the disclosure is not made with malicious intent or ill will;
- c) the disclosure is not frivolous or vexatious; and
- d) the report is not made for personal gain or agenda.

Every whistleblower must conduct themselves with high integrity and responsibility. Whenever necessary, the whistleblower may be required to be a witness for the Company for the appropriate disciplinary action to be effective.

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8. PROCEDURES

- a) Any concern should be reported to the Senior Manager of Human Resources Department. However, if it is not possible or appropriate to do so, the concern should then be reported to the Group Managing Director.
- b) Any concern that deemed not appropriate to be reported to the Group Managing Director should be raised to the attention of the Audit Committee.
- c) Upon receipt of the concern, the Group Managing Director or the Audit Committee (depending on who is the recipient of the reporting) shall set up an investigating team to conduct investigation on the issue/concern raised.

Whistleblowers can fill in the Whistleblowing Form as attached and email to:

Attention : Ms Cindy Booi Sek Tze
Designation : Senior Manager of Human Resources Department
Email : cindybooi@lbs.com.my

9. NOTIFICATION ON THE OUTCOME OF THE DISCLOSURE

Upon the completion of the whistleblowing process, the whistleblower will be notified on the outcome.

10. REVIEW OF POLICY

This Policy has been endorsed by the Board and is made available for reference on Company's corporate website and internal computer networking. It shall be reviewed and updated whenever necessary to ensure its effective implementation. Any subsequent amendments to this Policy should be approved by the Board.

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WHISTLEBLOWING FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact LBS Bina Group Berhad ("Company"). Please note that you may be called upon to assist in the investigation, if required.

(*) Denotes mandatory field

A. Your Contact Information* :

Name*	<input type="text"/>									
NRIC Number*	<input type="text"/>									
Phone Number*	<table border="1"><tr><td>Office</td><td><input type="text"/></td><td>Mobile</td><td><input type="text"/></td><td>Home</td><td><input type="text"/></td></tr></table>	Office	<input type="text"/>	Mobile	<input type="text"/>	Home	<input type="text"/>			
Office	<input type="text"/>	Mobile	<input type="text"/>	Home	<input type="text"/>					
Email Address*	<input type="text"/>									
Employment Details* (for employees only)	<table border="1"><tr><td>Name</td><td>:</td><td><input type="text"/></td></tr><tr><td>Department</td><td>:</td><td><input type="text"/></td></tr><tr><td>Position</td><td>:</td><td><input type="text"/></td></tr></table>	Name	:	<input type="text"/>	Department	:	<input type="text"/>	Position	:	<input type="text"/>
Name	:	<input type="text"/>								
Department	:	<input type="text"/>								
Position	:	<input type="text"/>								

B. Disclosure

Please include the details of the person alleged, nature of allegation and when the alleged Improper Conduct took place.

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C. Evidence

Please indicate the witness or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant supporting documents.

D. Declaration

I hereby declare that all the information given herein are made voluntarily and are true to the best of my knowledge and I will ensure that my participation in this matter will be kept confidential. I do understand that the Company will use the information and material provided throughout the process.

(Signature)

Name:

Date: