

# **KUMPULAN JETSON BERHAD**

(Company No. 34134-H)

# WHISTLEBLOWING POLICY

# **INTRODUCTION**

The Board of Directors, Senior Management and Employees of Kumpulan Jetson Berhad ("Jetson" or "the Company") and its subsidiaries (collectively refer to as "the Group") are committed to show high exemplary corporate conducts. The Code of Ethics and Conduct of Jetson ("the Code") required Directors, Senior Management and Employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As such, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. In line with the above commitment, this Whistleblowing Policy ("the Policy") is established to provide an avenue for all Directors, Senior Management and Employees of JETSON to disclose any improper conduct and to provide protection for them who report such allegations.

The Policy should be read in conjunction with the Code.

## **REPORTING RESPONSIBILITY**

It is the responsibility of all Directors, Senior Management and Employees to comply with the Code and to report violations or suspected violations in accordance with the Policy. The possible violations may cover improprieties such as corruption, bribery, criminal offences, fraud, miscarriage of justice, endangerment of employees' health and safety, failure to comply with regulatory/legal obligations and financial reporting irregularities, just to name a few.

## **NO RETALIATION**

No director, senior management or employee who acts in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. The Policy is intended to encourage and enable employees and others to raise serious concerns within the Group prior to seeking resolution outside.

# **REPORTING VIOLATIONS**

The Code addresses the Group's open-door policy and suggests that Employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an Employee's supervisor is in the best position to address an area of concern. However, if Employees are not comfortable speaking with their supervisor or the Employees are not satisfied with their supervisor's response, they are encouraged to speak with someone in the Group Human Resources Department or anyone in Management whom they are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when the Employees are not satisfied or uncomfortable with the following the Group's open-door policy, individuals should contact the Compliance Officer directly.

# **COMPLIANCE OFFICER**

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the Executive Director and/or the Risk Management and Audit Committee of the Company ("the Committee"). The Compliance Officer has direct access to the Committee and is required to report to the Committee on compliance activity as and when necessary.

The Compliance Officer is the Chairman of the Committee.

## ACCOUNTING AND AUDITING MATTERS

The Committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Committee of any such compliant and work with the Committee until the matter is resolved.

## **ACTING IN GOOD FAITH**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

## **CONFIDENTIALITY**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected

violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

# HANDLING OF REPORTED VIOLATIONS

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within seven (7) working days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

#### **REPORT ON THE CONCERNS**

Any concern should be reported to the Chairman of the Committee. Channels of reporting to the Chairman of the Committee are as follows:

i) Via email:

Email to the Company Secretary via cosec@jetson.com.my for onward transmission to the Chairman of Risk Management and Audit Committee;

or

ii) Via mail:

Mark "Strictly Confidential – To be opened by Chairman of Risk Management and Audit Committee only" and send the report to:

Kumpulan Jetson Berhad 11th Floor, Menara Tokio Marine Life No. 189, Jalan Tun Razak 50400 Kuala Lumpur Attention: Chairman of Risk Management and Audit Committee