

AMANAT LEBUHRAYA RAKYAT BERHAD WHISTLEBLOWING POLICY & PROCEDURE

OVERVIEW

1. This policy and procedure is a framework for reporting of concerns about irregularities within the Group's operations and to avert possible risks of loss or reputational damage to the Group.
2. It encourages and facilitates Employees to disclose Genuine concerns of Improper Conduct within the Group, whilst protecting the person making such disclosures from any reprisal action.

POLICY'S OBJECTIVE

1. To encourage and guide Employees and members of the public to communicate and disclose any Improper Conduct within the Group to the appropriate party within the Group in accordance with this Whistleblowing Policy and Procedure;
2. To clarify the protection accorded to Employees and members of the public who report allegations of any Improper Conduct;
3. To ensure disclosures of Improper Conduct is managed in an appropriate and timely manner.

SCOPE OF REPORTING

The Policy applies to any Improper Conduct by any Employee of the Group that affects others, such as other Employees, consultants, vendors, contractors, outside agencies or Employees of such agencies, and/or any other parties which have a business relationship with the Group.

MAKING A REPORT

Any person may make a report/disclosure on any Improper Conduct, which includes but is not limited to:

- a. Criminal offence or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail;
- b. Forgery or alteration of any document or account belonging to companies within the Group;
- c. Forgery or alteration of a cheque, bank draft, or any other financial document;
- d. Misappropriation of Group's funds, securities, supplies, or other assets;
- e. Impropriety in the handling or reporting of money or financial transactions;
- f. Profiteering as a result of insider knowledge of the Group's activities;
- g. Any conduct which is an offence or a breach of law; Financial malpractice;
- h. Breach of the Group's Code of Business Ethics, policies and guidelines;
- i. Improprieties of tender and procurement activities;
- j. Abuse of power and position for personal gain;
- k. Any act that poses danger to health and safety;
- l. Any act that causes damage to environment;
- m. Sexual harassment;
- n. Giving false or misleading information (including suppression of any material facts or information)
- o. Concealment of any of the above; and
- p. Any misconduct as stated in any of the Group's established policies and manuals.

ANONYMOUS REPORTS

Anonymous disclosures are allowed under this policy however it may hinder further investigations as follow up questions may be necessary. A Whistleblower who elects to remain anonymous shall not be protected from any Reprisal and the investigation of the reported disclosure is limited to the extent of the contents of the report received.

PROTECTION OF THE WHITBLEWOWER

A Whistleblower will be protected from any Reprisal as a consequence of the disclosure. Protection to the Whistleblower will be accorded by the Group only when all the following conditions are met:

- a. The disclosure is done in good faith, is not frivolous or vexatious or is not made with malicious intent or ulterior motive;
- b. The Whistleblower has not communicated the disclosure to any other party not related to the disclosure; and
- c. The disclosure made is not for personal gain or interest.

REPORTING CHANNELS

Reporting of any Improper Conduct may be made by completing the Whistleblower Form which can be downloaded from <https://www.amanatlr.com/misc/whistleblowing-reporting-form.docx> and submitting the completed form together with any supporting documents via any one of the following channels:

- a. via email to armac@amanatlr.com ; or
- b. submitting the completed form together with any supporting documents in a SEALED envelope marked '**PRIVATE & CONFIDENTIAL**' addressed to:

Chairman of Audit & Risk Management Committee (ARMC)
Kompleks Operasi LITRAK, KM19,
Lebuhraya Damansara-Puchong
Bandar Sunway, PJS 9
47500 Petaling Jaya
Selangor

COMMUNICATION AND CONFIDENTIALITY

All reports and identity of the whistleblower will be treated in a confidential and sensitive manner. Information relating to the disclosure made by a Whistleblower shall be restricted only to those who need to know of the matter, i.e. on a need-to-know basis.

Any announcement(s) as required by the regulatory authorities (e.g Securities Commission) shall be made accordingly in compliance with the disclosure requirements of the relevant regulations.