



Whistle Blowing Policy

1. Policy Statement

- 1.1 Integrated Logistics Berhad ('ILB') is committed to achieving and maintaining high standards of behavior at work.
- 1.2 All employees and stakeholders are encouraged to report in good faith genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal.
- 1.3 ILB views any harassments or retaliations in any form or manner against genuine whistle blowers seriously and will treat such action as gross misconduct, which may lead to dismissal.

2. Whistle Blowing

- 2.1 Whistle Blowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements.
- 2.2. Only genuine concerns should be reported under Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct.

3. Procedures

- 3.1 Any concern should be raised with the immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Group Chief Executive Officer ('Group CEO') through the **Whistleblower Report Form (Appendix A)**. The reporting Channel to the Group CEO is set out below :

Name : Tee Tuan Sem

Email : semtee@googlemail.com

Telephone : +603-5614 2555

Mail : *Mark* **Strictly Confidential**

Integrated Logistics Berhad
No. 6, Jalan Sungai Buloh 27/101A
Seksyen 27, 40400 Shah Alam
Selangor Darul Ehsan, Malaysia

Attention: Group CEO

- 3.2 In cases where reporting to management is a concern, then the reports should be made to the Chairman of the Audit & Risk Management Committee (“ARMC”) through the **Whistleblower Report Form (Appendix A)**. The Channel of reporting is set out below :

Name : Soh Eng Hooi

Email : enghooisoh@gmail.com

Telephone : +603-5614 2555

Mail : *Mark* **Strictly Confidential**

Integrated Logistics Berhad
No. 6, Jalan Sungai Buloh 27/101A
Seksyen 27, 40400 Shah Alam
Selangor Darul Ehsan, Malaysia

Attention : Chairman – Audit & Risk Management Committee

- 3.3 Upon receiving a report, the person receiving the report will provide the whistle blower an acknowledgement of receipt of the report within two (2) working days of receipt.
- 3.4 All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from the Chief Risk Officer. The progress of investigation will be reported to the ARMC latest by the next scheduled meeting.
- 3.5 Reports received anonymously will be treated as confidential.
- 3.6 Anonymity will be maintained as long as it is permitted by law, unless the person making the report indicates that he no longer wishes to remain anonymous.

4. **Investigation**

The Chief Risk Officer shall conduct a preliminary investigation of every report of misconduct received to determine whether there are merits to initiate a full investigation.

The findings of the preliminary investigation and recommendation shall be referred to the ARMC for a decision on whether to close the case or to proceed with a full investigation of the allegations. The ARMC would have an option to consult with other external specialist before deciding.

4.1 Upon reviewing the findings of the preliminary investigation, the ARMC may:

- instruct the matter to be closed in the event the preliminary findings clearly indicate that there are no circumstances that warrant a full investigation; or
- instruct the Chief Risk Officer to commence a full investigation in the event the preliminary findings clearly indicate suspicious circumstance. Where the Directors are not involved, the ARMC may delegate the oversight of the investigation and review of results of the investigation to the Chairman of ARMC; or
- in a case where the report involves the Directors, the Board may select a member amongst themselves (having due regard to suitable seniority and any circumstances that may give rise to conflicts of interest) or an independent third party, to investigate the allegations; or
- in cases where the preliminary findings disclose a possible criminal offence, seek consultation with external legal advisors, decide if the matter should be referred to the relevant authorities, such as the police or the Malaysia Anti-Corruption Commission ("MACC") for further action; or
- determine any other course of action that the Board deems fit having regard to the circumstances of the matter reported and the fairness of the conduct of any investigation.

4.2 If the matter is closed, the ARMC Chairman will inform the whistleblower that the matter is closed.

4.3 If the matter is to be referred to the authorities, subject to any legal requirements or prohibitions, ARMC Chairman will inform the whistleblower that the matter has been referred to the authorities.

4.4 In the event a full investigation is to be carried out, the ARMC Chairman will inform the whistleblower of the conduct of a full investigation and the whistleblower shall give his / her full cooperation during the conduct of the investigation.

5. Findings of Investigation

5.1 Upon the review of such investigation report, **the Directors** shall determine whether the allegation could be substantiated or not. In the event the allegation is substantiated, **the Directors** will identify and recommend the corrective action to be taken to mitigate the risks of such misconduct recurring and recommend if disciplinary action is to be taken against the wrongdoer.

5.2 Upon the review of such investigation report, **the Board** shall determine whether the allegation could be substantiated or not. In the event the allegation could be substantiated, **the Board** will identify and recommend the corrective action to be taken to mitigate the risks of such misconduct recurring and recommend if disciplinary action is to be taken against the wrongdoer.

6. Decision

6.1 In a case where the Directors reviewed the investigation and decided whether the allegation was substantiated or not, a completed **Whistleblower Report Form**, supporting documents together with recommendation of the Directors will be tabled to the Board. The Board will review the documents and decide on the corrective action to be taken and / or the disciplinary action to be taken (if any).

6.2 Subject to any prohibition in law or any legal requirements, the ARMC Chairman will inform the whistleblower that the investigation has been completed and the findings have been presented to the Board as the case may be. As the findings are confidential, the details of the findings will not be disclosed to the whistleblower.

7. Corrective Action

7.1 The Management shall carry out the decisions of the Board in relation to the findings of the investigation.

7.2 Where applicable, the Management shall institute the appropriate controls to prevent any further wrongdoings or damage to the Company.

8. Further action

8.1 If for any reason, the person making the report is not satisfied with the way his report had been dealt with, he can send his report to the Chairman of the ARMC. The Channel of reporting to the ARMC is set out below :

Name : Soh Eng Hooi
Email : enghooisoh@gmail.com
Telephone : +603-5614 2555
Mail : **Mark Strictly Confidential**

Integrated Logistics Berhad
No. 6, Jalan Sungai Buloh 27/101A
Seksyen 27, 40400 Shah Alam
Selangor Darul Ehsan, Malaysia

Attention : Chairman - Audit & Risk Management Committee

8.2 The Chairman of the ARMC will deliberate on the report with his Committee members and decide on the appropriate course of action.

APPENDIX A

**INTEGRATED LOGISTICS BERHAD
WHISTLEBLOWER REPORT 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 the Company. Please note that you may be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistleblowing Policy.

Reporter's Contact Information		
Name		
I/C No. / Passport No. / Staff No.		
Correspondence Address		
Telephone No.	Home	
	Office	
	Mobile	
E-mail Address		
Designation / Occupation		
Division/Section/Unit/Branch		
Preferred method of communication	<input type="checkbox"/> Mail <input type="checkbox"/> E-mail <input type="checkbox"/> Telephone / SMS	

Suspect's Information			
Individual 1			
Name			
Designation			
Division/Section/Unit/Branch			
Contact Number		Email Address	
How do you know this employee?			
Individual 2			
Name			
Designation			

Suspect's Information			
Division/Section/Unit/Branch			
Contact Number		Email Address	
How do you know this employee?			
Individual 3			
Name			
Designation			
Division/Section/Unit/Branch			
Contact Number		Email Address	
How do you know this employee?			

Details of Misconduct		
<p>COMPLAINT: Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</p>		
What misconduct / improper activity occurred?		
Who committed the misconduct / improper activity?		
When the misconduct / improper activity occurs? And since when did you notice about it?		
Where did the misconduct / improper activity happen?		
Is there any evidence that you could provide to us? *		
Do you have any other details or information which would assist us in the investigation?		
If money involved, can you estimate the amount of money involved?	Yes	No

Details of Misconduct		
If YES, please indicate the estimated amount of money involved (cross X where applicable):		
Less than RM500	<input type="checkbox"/>	
RM501 to RM10,000	<input type="checkbox"/>	
RM10,001 to RM50,000	<input type="checkbox"/>	
More than RM50,001	<input type="checkbox"/>	
Have you lodged a complaint on this matter to another person / department / authority before?	Yes	No
If YES, please indicate the person / department / authority that the report was lodged (cross X where applicable and attach copy of the report made):		
Police	<input type="checkbox"/>	
Malaysian Anti-Corruption Commission	<input type="checkbox"/>	
Others, please indicate:	<input type="checkbox"/>	
Date report was made		
Status of report made		
Declaration		
I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.		
I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.		
Signature		
Name		
Date		

For office use only	
Record No.	
Receipt Information	Person receiving this report:
	Date Received:
	Acknowledgement of receipt sent on:
Investigation required (Yes / No)? (If No, please state the reason)	
Investigation Done By:	
Investigation Result:	
Action Taken / Conclusion:	
Reported to the Board on:	
Signed off by:	