



## **YEW LEE PACIFIC GROUP BERHAD**

[Registration No. 202001036243 (1392564-D)]

(Incorporated in Malaysia)

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### **WHISTLEBLOWING POLICY AND PROCEDURES**

#### **1. POLICY STATEMENT**

Yew Lee Pacific Group Berhad (“the Company”) is committed to upholding the highest standards of ethics and integrity among all directors, managers and employees in line with good corporate governance and business practices.

The Company has established this Whistleblowing Policy to provide an avenue for employees and members of the public to raise genuine concerns regarding any wrongdoing or improper conduct involving the Company, its directors or employees.

#### **2. OBJECTIVE**

The objective of this policy is to encourage reporting of any suspected fraud, corruption, misconduct or inappropriate behavior within the Company.

The policy provides a safe and confidential channel for employees, agents, vendors, contractors, suppliers, consultants, customers and members of the public to raise concerns in good faith without fear of retaliation. It also ensures protection for individuals who report such allegations in good faith, thereby strengthening accountability and transparency in the Company’s business operations.

#### **3. TYPE OF IMPROPER CONDUCT**

The following shall constitute “Reportable Misconduct” under this policy, including but not limited to:

- i. Fraud and misappropriation of funds or assets;
- ii. Bribery, corruption or blackmail;
- iii. Violation of the Company’s code of conduct, procedures or policies;
- iv. Improper or unethical conduct or behavior;
- v. Conflict of interest;
- vi. Theft or embezzlement of funds or assets;
- vii. Abuse of power or position;
- viii. Breach of confidentiality;
- ix. Criminal breach of trust;
- x. Failure to comply with any legal obligations or internal controls;
- xi. Danger to health and safety of employees or others; and
- xii. Sexual harassment.

#### 4. PROTECTION TO WHISTLEBLOWER

##### a) Confidentiality

The Company is committed to maintaining the confidentiality of all whistleblowing reports. The identity of the whistleblower will be kept confidential and protected unless disclosure is required by law. All reports will be treated with strict confidentiality and investigated promptly.

##### b) Protection Against Retaliation

The Company strictly prohibits retaliation against any whistleblower who reports a concern in good faith. Employees will be protected against any form of adverse action, including disciplinary measures, by their supervisors or any person in authority.

However, any report made in bad faith or containing false, frivolous, or malicious allegations, may result in disciplinary action.

#### 5. WHISTLEBLOWING CHANNEL

##### 5.1 Reporting Channels

**All concerns or suspected misconduct may be reported through the following channels:**

- **Email:** [whistleblowing@yewlee.com.my](mailto:whistleblowing@yewlee.com.my)
- **Postal Address:**  
**18, Jalan Johan 2/1, Kawasan Perindustrian Pengkalan 2, 31550 Pusing, Perak.  
(Attention: Chairman, Audit and Risk Management Committee (ARMC))**

**All reports should include sufficient details of the alleged misconduct, including supporting evidence where possible.**

##### 5.2 Reports by Employees

- (a) Employees are encouraged to report concerns directly via the above channels. Where the report involves Senior Management, Director or members of the ARMC, the matter shall be escalated directly to the Chairman of the Board.
- (b) Upon receipt of a report, the Chairman of ARMC will assess its seriousness and assign it to the appropriate personnel or Investigator.
- (c) The progress of the investigation will be reported to the ARMC.
- (d) Upon completion, a full report with recommendation will be submitted to the ARMC for their deliberation.
- (e) Appropriate corrective and disciplinary actions will be taken, including measures to prevent recurrence.
- (f) Employees are required to cooperate fully in any investigation conducted under this Policy.

### **5.3 Reports By External Parties**

- (a) External parties are encouraged to report any improper conduct as soon as it is identified.
- (b) Reports should be made in writing the sufficient details and where possible, supporting evidence.
- (c) The ARMC Chairman, in consultation with ARMC members, will determine whether the matter requires further investigation.
- (d) When necessary, an internal auditor or independent party may be appointed to conduct the investigation.
- (e) Upon completion, the ARMC will review the findings and recommend appropriate action to the Board.
- (f) ARMC Chairman to report or update at quarterly ARMC meeting on the whistleblowing complaints received at the ARMC meeting, if any.
- (g) The whistleblower will be informed of the outcome, where appropriate.

## **6. AMENDMENT OF POLICY**

This policy may only be amended with the approval of the Board of Directors. It will be reviewed periodically to ensure its continued effectiveness and alignment with best practices and the Company's needs.

**END.**

**WHISTLEBLOWING REPORT FORM**

(Confidential)

The report should be lodged to the Chairman of Audit and Risk Management Committee

**A. Whistleblower Information (Optional for Anonymous Reporting)**

Name:	
Employee ID (if applicable):	
Department / Company:	
Contact Number:	
Email Address:	

I wish to remain anonymous

**B. Details of the Person(s) Involved**

Name(s):	
Position / Department:	
Company (if external party):	

**C. Details of the Concern**

- Type of misconduct (please tick):
  - Fraud / Theft
  - Corruption / Bribery
  - Harassment
  - Safety / Environmental Issue
  - Conflict of Interest
  - Others: \_\_\_\_\_
- Description of incident (Please provide full details):

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- Date(s) of incident: \_\_\_\_\_
- Location: \_\_\_\_\_

**D. Supporting Evidence / Documents**

- Attached (please specify): \_\_\_\_\_
- Not available

**E. Declaration (Optional)**

I confirm that the information provided is true and accurate to the best of my knowledge and is made in good faith.

- Signature: \_\_\_\_\_ (leave blank if anonymous)
- Date: \_\_\_\_\_