

# GROMUTUAL

## **GROMUTUAL BERHAD 200301022614 (625034-X) Whistle-blowing Policy**

### **Objective**

The Gromutual Berhad Board of Directors wishes to provide all directors, management staffs and employees of Gromutual Berhad and its subsidiaries with mechanisms for employees and other interested parties to confidentially bring to the attention of the Audit Committee ("AC") any concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate manner.

The whistle-blowing policy allows the Management to take appropriate preventive and corrective actions inside the Company without the negative effects that come with public disclosure, such as loss of Company image or reputation, financial distress and loss of investor confidence. Through this program, employees are encouraged to discreetly disclose concerns about illegal, unethical or improper business conduct within the Company. In this manner, the employees can help the Company to monitor and keep track of such illegal, unethical or improper business conduct within the Company which otherwise may not be easily detected through normal process or transaction.

### **Scope of the Policy**

This policy is designed to facilitate employees to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- i. Fraud;
- ii. Bribery;
- iii. Abuse of power;
- iv. Conflict of interest;
- v. Theft or embezzlement;
- vi. Misuse of Company's assets and funds; and
- vii. Non-compliance with policies and procedures

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct or any criminal offence under relevant legislations in force. This policy is for the employees to raise the matters in an independent and unbiased manner. Employees are not required to prove the cases but rather to provide sufficient information for the Management to take appropriate steps. The whistle-blower can report the concerns in writing via Appendix – I Whistle Blowing Reporting Form appended to this Policy to the designated Compliance Team or AC Chairman.

The concerns reported to the AC Chairman will be managed by the AC Chairman and he/she shall have the right to decide, depending on the seriousness of the reported incident(s), to report to the relevant enforcement authority(ies) (if the AC Chairman concluded that such incidents to be reported, based on the supporting documents and facts gathered).

In the event that actual or suspected bribery or corruption reported to the AC Chairman, a summary of reported incidents, its progress, results of investigation, corrective actions, resolution and decision taken or to be taken to be communicated by the AC Chairman to the designated Compliance Team for his/her anti-bribery and corruption monitoring and continuous improvement purposes.

### **Investigation**

The designated Compliance Team or the AC Chairman shall carry out investigation on all alleged incidents reported to establish their credibility if sufficient supporting documents and facts of the malpractices provided to designated Compliance Team or the AC Chairman. The designated Compliance Team or the AC Chairman, at his/her discretion, shall conduct the investigation in confidence via review documentation and electronic files, conduct internal audit or forensic audit, third party interviews and confirmation, seek advices from subject matter experts, etc. with the evidence and review properly documented and retained for period of at least seven (7) years.

The designated Compliance Team or the AC Chairman, shall have the access of professionals necessary and required for the investigation, the cost of the Company.

### **Consequences of Wrongdoing or Wrongful Disclosure**

The designated Compliance Team or the AC Chairman shall revoke the whistleblower protection conferred if he/she is of the opinion, based on his/her investigation or in the course of his/her investigation that the whistleblower has, or is found to have:

- committed a wrongdoing;
- participated in the improper conduct disclosed;
- made in his disclosure of improper conduct a material statement which he knew or believed to be false or did not believe to be true;
- made the frivolous or vexatious disclosure of improper conduct;
- made the disclosure of improper conduct solely or substantially with the motive of avoiding dismissal or other disciplinary action;

- committed a breach under this Policy (for instance, dishonest, mischievous or malicious complaints), in the course of making the disclosure or providing further information; or
- participated or assisted in any process pursuant to this policy otherwise than in good faith.

The corrective actions to be taken against that whistleblower will be determined by the Top Management on the advice of designated Compliance Team or the Board of Directors on the advice of the AC Chairman, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

Any attempt to retaliate, victimize or intimidate against whistleblower making report in good faith is a serious violation of the Policy and shall be dealt with serious disciplinary actions and procedures decided by the Board of Directors on the advice of designated Compliance Team or the AC Chairman.

### **Protection to Whistleblower**

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. The whistleblower will be protected under the Whistleblower Protection Act 2010 if he or she makes a disclosure in good faith to an enforcement agency. Whistleblower will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within Gromutual Berhad Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

If a whistle-blower reasonably believes that he is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he may consult or report to the designated Compliance Team or AC Chairman, as the case maybe.

Any anonymous disclosure will not be entertained. However, the Company reserves its right to investigate into any anonymous disclosure.

## **Administration**

This Policy is administered by Gromutual Berhad Top management and overseen by the AC and reported to the Board of Directors, with the protection of the whistleblower in compliance with Whistleblower Protection Act 2010. Employees and other interested parties are able to report their concerns about possible improprieties in matters of financial reporting, compliance and other malpractices to the designated Compliance Team or AC Chairman.

Contact persons:

AC Chairman

Name: Mr Wong Wen Tak

Email: [acchairman@gromutual.com](mailto:acchairman@gromutual.com)

The designated Compliance Team:

Name: Ms Teo Shin Dih/ Ms Tham Yap Mey/ Ms Kuan Ying Hwai

Email: [compliance@gromutual.com](mailto:compliance@gromutual.com)

Reviewed and approved on: 29 November 2021