

Whistle-Blowing Policy

Effective Date : 29 July 2022
Rev : 00

1. BACKGROUND

Unique Fire Holdings Berhad ("**Company**") and its group of subsidiaries ("**the Group**") is committed to promoting and maintaining high standards of transparency, accountability, ethics and integrity in the conduct of its business and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Accordingly, the Board of Directors of the Company has established a Whistle-Blowing Policy ("**Policy**") to provide an avenue for all employees ("**Employees**") and members of the public to voice or raise genuine concerns in a responsible and appropriate manner. The Audit and Risk Management Committee of the Company has overall responsibility for this Policy and shall oversee the implementation of this Policy.

2. OBJECTIVE OF THE POLICY

This Policy is formulated to enable the reporting of genuine concerns about any actual or possible improprieties at the earliest opportunity so that the appropriate actions can be taken to address or mitigate such concerns.

This Policy is designed to:

- (a) promote and maintain high transparency and accountability in the workplace;
- (b) promote good corporate governance practices in the workplace;
- (c) encourage employees and other relevant stakeholders to report perceived unethical or illegal conduct across the Group through a confidential channel without any fear of harassment, intimidation, victimization or reprisals of anyone for raising concerns under this Policy;
- (d) protect a whistleblower from reprisal as consequence of making a disclosure;
- (e) provide a transparent and confidential process for dealing with concerns;
- (f) protect the long-term reputation of the Group;
- (g) support the Company and the Group's values; and
- (h) maintain a healthy working culture and an efficient corporation.

3. SCOPE OF POLICY

This Policy applies to all Employees, third parties of the Group, and the general public, who have become aware of or genuinely suspects on a reasonable belief that a person associated with the Group, including a Director, Employee, and a third party who has a business relationship with the Group, has engaged, is engaged or is preparing to engage in any improper conduct or wrongdoing. This policy shall exclude any issues, complaints or concerns regarding the following:-

- i) matters pending determination or which have been determined through any tribunal or authority or court, arbitration or similar proceedings; or
- ii) disclosure specifically prohibited by any written law.

A person who has made a report in accordance with this Policy is hereinafter referred to as a "**Whistleblower**".

Such improper conduct or wrongdoing may include, without limitation, the following:

- (a) fraud or deliberate error in the preparation, evaluation, review or audit of any financial statements of the Group;
- (b) fraud or deliberate error in the recording and maintaining of financial records of the Group;
- (c) corruption, bribery and blackmail;
- (d) acceptance of gifts or favour beyond the threshold allowed by the Group;
- (e) misuse or misappropriation of the Group's funds or assets;
- (f) abuse of power;
- (g) action causing injury, loss or damage;
- (h) negligence in carrying out work obligations;
- (i) conflict of interest without disclosure;
- (j) criminal breach of trust;
- (k) illegal or criminal offence;
- (l) actor omission which endangerment of employees' or public health and safety;
- (m) deficiencies in or non-compliance with the Group's internal controls;
- (n) misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Group;
- (o) deviation from full and fair reporting of the Group's financial condition;
- (p) deliberate concealment of any of the above matters or wrongdoing;
- (q) non-compliance with the laws, regulations, regulatory requirements or any act against the Group's interests;
- (r) breach of the code of ethics of the Group (including sexual, physical or other abuse of human rights); and
- (s) concealment of any, or a combination, of the above.

The improper conduct or wrongdoing above is not exhaustive. It is important to note that when determining the impropriety conduct, it is not only measured in terms of monetary value lost, or damage to a particular business, but it may also be adversely affected to the integrity and reputation of the Group itself.

Whenever possible, any concerns should be raised and dealt with through the normal reporting lines and procedures in the Group. However, where it is believed that the concern cannot be resolved through normal reporting lines and procedures, or implicates senior levels of management within the Group, or the employee's employment or even safety or security may be jeopardised by raising the concern, then the concern can be raised through the channel provided in this Policy.

4. REPORTING IN GOOD FAITH

The Group expects a Whistleblower to report genuine concerns in good faith and have reasonable grounds when making a whistle-blowing report ("**Complaint**"). In general, a Whistleblower may report a Complaint in writing, electronically, or in person.

An employee who whistle-blows internally shall be protected against reprisals or retaliation and immunity from disciplinary action from his/her immediate superior or department/division head or any other person exercising power or authority over the whistle-blower in his/her employment, provided that:

- (a) only genuine concerns are reported with a reasonable belief that the information and any allegation in it are substantially true, and the whistle-blower does not provide false or misleading information knowingly, negligently or recklessly in the report;
- (b) the report is not made with malicious or ill will; and
- (c) the report is not made for personal gain or agenda.

To assist the Group in the response to or investigation of a Complaint, the Complaint should contain as much specific, factual information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the Complaint, including, without limitation and to the extent possible, the following information:

- (a) his/her name, designation, current address and contact numbers;
- (b) basis or reasons for his/her concerns, for instance, its nature, the date, time, and place of its occurrence and the identity of the alleged wrongdoer;
- (c) particulars of witnesses, if any; and
- (d) particulars or the production of documentary evidence, if any.

The Whistleblower may be asked to provide further clarification and information from time to time, for example, if an investigation is conducted.

All information received will be treated with the strictest confidentiality.

Should you wish to do so, Whistleblower may use our Whistleblower Form as set out in “**Annexure A**” to provide the details required.

The Whistleblower is encouraged to disclose his or her name and contact method to enable contact for obtaining further understanding and information relating to the Complaint where necessary. Anonymous reporting is not prohibited. Nevertheless, the extent to which a Complaint can be investigated may be limited to the information provided.

5. WHISTLE-BLOWING CHANNELS

5.1 For Employees to make reports

Any concern should be reported to the immediate supervisor. However, if it is not possible or appropriate to do so, the concern should then be reported to an independent individual in the Company who is not subject to undue influence or pressure by management. Individuals who may be considered appropriate (“**Designated Party**”) include:

- (i) member or Chairperson of the Audit and Risk Management Committee;
- (ii) senior independent director, if any (usually for complaints relating to directors and other senior management positions);
- (iii) head of a dedicated department that handles investigations of misconduct or any other related matters and has a direct reporting line to independent directors.

5.2 For stakeholders to make reports

Stakeholders, who have suspected fraud, misconduct, or any integrity concerns, can submit their reports to the Chairperson of the Audit and Risk Management Committee, via the following channels:

- (a) by mail in a properly sealed envelope and indicated “Strictly Confidential – To Be Opened by Addressee Only” to the following address:-

UNIQUE FIRE HOLDINGS BERHAD
NO. 9, JALAN ANGGERIK MOKARA 31/55,
SEKSYEN 31 KOTA KEMUNING,
40460 SHAH ALAM, SELANGOR.
Attn: Chairperson of the Audit and Risk Management Committee

- (b) by email to whistleblowing@uniquefire.com

6. HANDLING OF COMPLAINTS

The action taken by the Group in response to a report of concern under this Policy will depend on the nature of the concern. The complaint received may direct to the division/department best placed to address it or lead the investigation to ensure prompt and appropriate investigation and resolution. Investigations should be launched only after preliminary consideration by the head of the respective division/department to establish that:

- 1.0 The allegation, if true, constitutes an improper act¹, and either;
- 2.0 The allegation is accompanied by information specific enough to be investigated; or
- 3.0 The allegation has or directly points to corroborating evidence that can be pursued. Such evidence may be testamentary or documentary.

All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate for the conduct of the investigation and to undertake any remedial action, in accordance with any applicable laws and regulations.

The Company reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

If, at the conclusion of an investigation, the Company determines that a violation has occurred or the allegations are substantiated, remedial action commensurate with the severity of the offence will be taken.

¹ Matters that do not meet this standard may be worthy of management review but should not be undertaken as an investigation of an improper conduct or malpractice.

7. CONFIDENTIALITY AND PROTECTION TO WHISTLEBLOWER

The Company will take all reasonable steps to protect the confidentiality of identity of a whistleblower, to the extent reasonably practicable and will adhere to any statutory requirements in force.

Any employee of the Company and/or its subsidiaries, who whistleblows will also be protected against reprisals or retaliation, and immunity from disciplinary action from the Whistleblower's immediate supervisor or department/division head or any other person exercising power or authority over the Whistleblower in his/her employment, provided that: -

- (a) only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the Whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;
- (b) the disclosure is not made with malicious intent or ill will;
- (c) the disclosure is not frivolous or vexatious; and
- (d) the report is not made for personal gain or agenda.

The Designated Party and the Chairperson of the Audit and Risk Management Committee shall maintain the confidentiality of the Complaint and the identity of the Whistleblower to the fullest extent reasonably practicable within the legitimate needs of law and only be revealed to those handling the Complaint, including investigation and deliberation, strictly on a "need-to-know" basis.

The identity of the Whistleblower shall remain confidential unless consent is obtained from the Whistleblower or otherwise required by law. Notwithstanding, the identity of a Whistleblower might become known for reasons outside the control of the Group. The confidentiality of the identity of the Whistleblower is subjected to such limitations.

The identity of other persons subject to, or participating in, any inquiry or investigation relating to a Complaint shall also be maintained in confidence subject to the same limitations.

A Whistleblower who reports a Complaint in good faith shall be protected from any reprisal by the Group or its personnel as a direct consequence of the disclosure. Reprisal includes discharge, termination, demotion, suspension, threatening, harassment, or discrimination or retaliation against any persons in relation to the terms and conditions of business relationships such as employment or contract.

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.

If a whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimization, as a consequence of whistle-blowing, he or she may consult or report to the Chairperson of the Audit and Risk Management Committee via email to whistleblowing@uniquefire.com.

8. CONSEQUENCES OF WRONGDOING OR WRONGFUL DISCLOSURE

If the Whistleblower has, or is found to have

- (a) committed a wrongdoing;
- (b) taken serious risks which would likely cause a wrongdoing to be committed;
- (c) made a disclosure not in accordance with the requirements of this Policy (for example, dishonest, mischievous or malicious complaints); or
- (d) participated or assisted in any process pursuant to this Policy otherwise than in good faith.

The corrective actions to be taken against the Whistleblower will be determined by the Managing Director (“MD”), or, if so delegated by the MD, the senior management, which may include, disciplinary measure, formal warning or reprimand, demotion, suspension or termination of employment or services or other forms of punishment.

9. REPORTING AND RETENTION OF COMPLAINTS AND INVESTIGATIONS

The Human Resource Department will maintain a log of all Complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary thereof for the Audit and Risk Management Committee members, as and when necessary, taking into consideration the protection of confidentiality especially of the identifies of Whistle-blowers. Copies of Complaints and such log will be maintained in accordance with the Group’s document retention policy.

10. WHISTLEBLOWER PROCEDURES DIFFERENT FROM GRIEVANCE PROCEDURES

Typically, whistle-blowing does not affect the complainant personally. They are therefore different from a normal grievance or complaint in which the complainant is personally affected. If an employee is the victim of an Improper Conduct, the complaint shall be channelled through the grievance procedure so that the appropriate action may be taken and any restitution be made (if applicable).

11. REVIEW OF THIS POLICY

The Board shall review and assess the relevance and effectiveness of this Policy periodically to assess their effectiveness, and in any event, at least once every three (3) years pursuant to the ACE Market Listing Requirement of Bursa Malaysia Securities Berhad, the Board deem necessary and/or require to ensure its relevance and effectiveness in keeping with the Group’s changing business environment, administrative or operational needs as well as changes to legislations.

12. REVISION OF THIS POLICY

The provisions of this Policy can be amended and supplemented from time to time by a resolution of the Board.

Annexure A
WHISTLEBLOWING REPORT FORM

Please provide the following details for any genuine concerns about possible improprieties or other malpractices. Kindly take note that you may be called upon to assist in the investigation, if so required.

Note: Please follow the guidelines and procedures as laid out in the Whistleblowing Policy of the Company

REPORTER'S CONTACT INFORMATION

(This section may be left blank if the reporter wishes to remain anonymous)

NAME

DESIGNATION

DEPARTMENT/AGENCY

CONTACT NUMBER*

E-MAIL ADDRESS *

SUSPECT'S INFORMATION

NAME *

DESIGNATION

DEPARTMENT/AGENCY

CONTACT NUMBER

E-MAIL ADDRESS *

WITNESSES' INFORMATION (if any)

NAME *

DESIGNATION

DEPARTMENT/AGENCY

CONTACT NUMBER

E-MAIL ADDRESS *

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.)

1. What misconduct / improper activity occurred?

2. Who committed the misconduct / improper activity/malpractice?

3. When did it happen and when did you notice it?

4. Where did it happen?

5. Is there any evidence that you could provide us?

Annexure A**Page 2****WHSTLEBLOWING REPORT FORM**

6. Are there any other parties involved other than the suspect stated above?

7. Do you have any other details or information which may assist us in the investigation?

8. Any other comments?

Signature:

Date:

Remark:

() Mandatory information to be completed.*