



ASM AUTOMATION GROUP BERHAD
[Registration No. 202401033717 (1579565-M)]

WHISTLEBLOWING POLICY

Section: All Departments	Ref No: : WB01
Policy: Whistleblowing Policy	Latest Issued Date: 24 SEP 2024

POLICY STATEMENT

ASM Automation Group Berhad (“ASM” or “the Company”) and its group of companies (“Group”) is committed to the highest standard of integrity, openness and maintaining high standard of accountability in the conduct of its businesses and operations. ASM aspires to conduct its affairs in an ethical, responsible and transparent manner which is vital to the success of the Group.

OBJECTIVE OF WHISTLEBLOWING POLICY

To provide an avenue for all employees of the Group and members of the public to disclose any improper conduct in accordance with the procedures as provided under this Whistleblowing Policy (“Policy”) and to protect them under such allegations.

This Policy is intended to encourage all employees to raise serious and genuine concern(s) about any improper conduct without fear of victimisation, harassment, discrimination or intimidation from the wrongdoer.

SCOPE OF THE POLICY

This Policy is aimed to address issue such as reporting, responsibility, confidentiality, investigation and resolution to the improper conduct reported. Such improper conduct includes the following:

- 1) Fraud;
- 2) Bribery or corruption;
- 3) Abuse of power or management override;
- 4) Conflict of interest;
- 5) Theft or embezzlement;
- 6) Misuse of the Company’s property;
- 7) Negligence
- 8) Miscarriage of justice
- 9) Danger to health and safety or to the environment;
- 10) Non-Compliance with procedure or failure to comply with legal or regulatory requirements;
- 11) The cover-up of any of these in the workplace.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under ASM’s Code of Conduct and Ethics or any criminal offence under relevant legislations in force.

Whistleblowing procedures are varying from grievance procedures. Typically, whistleblowing does not affect the complainant personally. They are different from a normal grievance/complaint in which the complainant is personally affected.

APPLICABILITY OF THE POLICY

Subject to the requirement of applicable local jurisdiction, this Policy applies to all employees of the Group and extends to members of the public, where relevant.

PROCEDURES TO MAKE WHISTLE BLOWING REPORT

1. The Whistle-blower should come forward with the information that he/she, in good faith and reasonably believes that an improper conduct was committed, is being committed or will be committed.
2. Any concerns should initially be reported to the immediate superior. However, if for any reason the Whistle-blower is reluctant to do so, then the Whistle-blower shall report directly to the Chairperson of the Audit and Risk Management Committee ("ARMC") of ASM by completing the information required in the Whistleblowing Report Form annexed herewith as Appendix 1. If the matter involves the Chairperson of ARMC, the Whistle-blower should report directly to the Chairperson of the Board of Directors ("Board") of ASM.
3. Whistle-blowers have the option to make whistleblowing reports in strict confidence through any of the following channels:

(a) Via Post

Send the completed Whistleblowing Report Form via a sealed envelope marked "**Strictly Private & Confidential**" to the following address:

ASM Automation Group Berhad

No. 1, Persiaran Perindustrian Pengkalan 15,
Kawasan Perindustrian Pengkalan,
31500 Lahat, Perak

Attention: Chairman of Audit and Risk Management Committee

(b) Via E-mail

E-mail the completed Whistleblowing Report Form to the ARMC Chairperson at the designated email address at whistleblowing@arrowsystemsonline.com.

4. The Whistleblowing Report Form must be completed with the following details of the Whistle-blower and improper conduct, together with the supporting evidence, if possible:
 - (i) Full name;
 - (ii) NRIC or passports; and
 - (iii) Contact details such as telephone number and email address.

This will enable the Company to accord the Whistle-blower necessary protection under this Policy and also obtain more details pertaining to the whistleblowing report.

Anonymous Whistle-Blower

Any anonymous complaints will not be entertained under this Policy. However, concern(s) raised anonymously may be considered by the ARMC provided that **strong documentary**

evidence is enclosed. The ARMC shall have the discretion to determine whether or not to pursue investigation on such anonymous allegation and such decision shall be final. In exercising this discretion, the ARMC will take into consideration the following factors:

- (i) Seriousness of the issues raised;
- (ii) Credibility of the whistleblowing report; and
- (iii) Likelihood of confirming the allegation from the relevant sources.

WHISTLEBLOWING INVESTIGATION

1. Upon receipt of the whistleblowing report, the ARMC will, as soon as practicable, establish a Whistleblowing Investigation Team. Such investigation team shall not comprise of staff from the same department of the person under investigation or his/her Head of Department, and the members of the said investigation team must hold higher rank/position than the person under investigation.

The ARMC Chairperson may engage the internal auditor of the Company or an independent party to carry out the investigation. The Whistle-blower shall give his/her full cooperation during the course of the investigation, if required.

The investigation would not be tantamount to an accusation or witch hunting and is to be treated as a neutral fact-finding process.

2. If the Whistleblowing Investigation Team finds that the alleged wrongdoing or misconduct is true, the Company will take appropriate actions including disciplinary action, termination of contract and establishing new controls to prevent recurrence of the wrong doing or misconduct in our company.
3. A member of the Whistleblowing Investigation Team will, within 10 calendar days, contact the Whistle-blower to:
 - (i) to acknowledge that the whistleblowing report has been received; and
 - (ii) to indicate how the report will be dealt.
4. The ARMC will keep a record of all steps taken in response to each whistleblowing report received as well as how the concerns raised were resolved. Thereafter, the ARMC will reports their findings to the Board.
5. Whistleblowing reports should include the following disclosures:
 - (i) Background and history of the concern (giving relevant dates);
 - (ii) Reason for the concern; and
 - (iii) Identity of the person(s) committing the alleged wrong doing. Insufficient details in the whistleblowing report may impede the investigation and resolution of the concerns raised.
6. The ARMC will inform the Whistle-blower the completion of investigation but, the details of the findings shall not be disclosed to the Whistle-blower.

CONFIDENTIALITY AND PROTECTION TO WHISTLE-BLOWER

A. Confidentiality

A Whistle-blower will be accorded with protection of strict confidentiality of identity to the extent reasonably practicable unless otherwise required by law or for purpose by or against the Company. The Company will treat all disclosures in a confidential and sensitive manner.

The investigation process may reveal the source of the information and the Whistle-blower may be required to provide a statement as part of the evidence.

B. Harassment or Victimisation

In addition, an employee who whistles blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith.

The Company will treat such harassment, victimisation or detrimental actions by any employee of the Company as misconduct and institute disciplinary proceedings should there be any cause to consider as harassment, victimisation or detrimental actions against the Whistle-blower.

This Whistleblowing Policy offers protection within limits of the law and to the extent reasonably practicable to Employees and Stakeholders who submit whistleblowing reports in good faith, even if the allegations prove to be unfounded or mistaken. These Employees and Stakeholders will be appropriately protected from internal disciplinary actions (if applicable), dismissal, harassment, victimization or informal pressures. No protection from internal disciplinary action will be offered if Employees do not adhere to the procedures for whistleblowing and disclosures in this Policy.

Notification

The Whistle-blower will be accorded the privilege to be notified on the outcome of the disclosure upon the completion of the whistleblowing process and procedures.

Circulation and review

This Policy will be circulated to all employees of the Group and will be reviewed regularly by the ARMC. Any revisions and amendments to this Policy will be communicated to all employees of the Group accordingly.

APPENDIX 1**WHISTLEBLOWING REPORT FORM**

CONTACT INFORMATION	
Name:	
NRIC No. / Employee No:	
Contact Number :	(H/P) : (H):
Email Address :	
Nature of Misconduct :	Please include: i.) Background and history of concern (with relevant dates); ii.) Venue of incident; iii.) Identity of person(s) involved in wrongdoings; and iv.) Supporting evidence.
Report:	

I have read and understood the Whistleblowing Policy. I affirm that all information submitted in my whistleblowing report is true to the best of my knowledge and agree to extend my full cooperation to the Company in their investigation of my complaint.