



# **TPC PLUS BERHAD**

Company No. 615330-T  
(Incorporated in Malaysia under the Companies Act, 1965)

## **WHISTLE BLOWING POLICY**

Approved by the Board of Directors on 25 February 2016

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## 1. INTRODUCTION

- 1.1 The primary objective of this Whistle Blowing Policy is to create a conducive workplace in TPC Plus Berhad (“**TPC**” or “**the Company**”) and its subsidiaries (collectively referred to as “**TPC Group**” or “**the Group**”) that is based on trust, honesty, openness and transparency and to eradicate unethical practices at the workplace.
- 1.2 Employees within the TPC Group is encouraged to disclose (whistle blow), internally and at a high level, any malpractice or misconduct which they become aware of.
- 1.3 Some examples of unethical practice, malpractice or misconduct include, but not limited, to the following:
  - 1.3.1 A criminal offence.
  - 1.3.2 The use of deception to obtain an unjust or illegal financial gain either for the business unit or personally.
  - 1.3.3 Intentional misrepresentation, directly or indirectly, affecting the Company or the Group’s financial statements.
  - 1.3.4 Non-professional or non-ethical conduct or behavior such as corruption, bribery, blackmail, theft, misuse of Company’s property or assets, abuse of power, conflict of interest or fraud.
  - 1.3.5 The deliberate concealment of any information of the above.
- 1.4 In view of the Malaysian Code on Corporate Governance (“**MCCG**”) by Securities Commission Malaysia particularly Practice 3.2 of the MCCG, this Policy also aims to ensure that the Company complies with all the relevant requirements of MCCG.

## 2. POLICY

- 2.1 The Company will take all reasonable steps to protect the confidentiality of the identity of a whistleblower and will adhere to any statutory requirements in force.
- 2.2 An employee of the TPC Group who whistle-blows will also be accorded protection against any detrimental action in reprisal for disclosing such improper conduct within TPC Group provided such disclosures are made in good faith. Such protection will continue notwithstanding that, after investigation, it is shown that the whistleblower was mistaken as to the facts, rules or procedures of improper conduct.

- 2.3 Detrimental action in reprisal against the whistleblower includes action causing injury, loss or damage; intimidation or harassment; interference with the lawful employment or livelihood including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the whistleblower's employment, career, profession, trade or business or the taking of disciplinary action; and includes a threat to take any of the aforesaid detrimental actions.
- 2.4 The Company will not entertain any anonymous disclosure. The person who wishes to whistle-blow any improper conduct within TPC Group is required to disclose his or her name, NRIC number and contact telephone number (mobile, home and/or office). These identity details will be kept confidential to afford protection to the whistleblower.
- 2.5 The whistleblower remains liable for his or her own conduct and is responsible to ensure that the disclosure is made in good faith and free from any malicious intent. The Company does not have the power to offer any person immunity against prosecution in the criminal jurisdiction.
- 2.6 In making a disclosure, an employee is expected to exercise due care to ensure the accuracy of the information given. Where it is shown that a person purporting to be a whistleblower has made a false report or disclosure and/or has made a report or disclosure with malicious intent, frivolous or vexatious, the Company reserve the right to take disciplinary action against the said employee and revoke the protection accorded to the said employee under this Policy.
- 2.7 TPC is committed to protect genuine whistleblowers. Where the investigation later revealed that the whistleblower was mistaken as to the facts, rules or procedures of improper conduct, the protection under the Policy would still be accorded to the whistleblower.

### **3. PROCEDURE**

- 3.1 Any person who has knowledge or is aware of any improper conduct within TPC Group is encouraged to make such disclosure in accordance with the procedures stated herein.
- 3.2 Disclosures can be made in strict confidential manner to:
- 3.2.1 **Mr Tham Chee Yang**  
e-mail : cheeyang\_5@hotmail.com
- Or
- 3.2.2 **Ms Low San Ying**  
e-mail : sylow@tpc.com.my

- 3.3 In order for the whistleblower to be protected under the Policy and also to obtain more details and information on the disclosure made by the whistleblower, the whistleblower is required to disclose his or her personal details (which will be kept confidential) as follows:
- 3.3.1 Name;
  - 3.3.2 NRIC number; and
  - 3.3.3 Contact telephone numbers – mobile, home and/or office.
- 3.4 In addition to the personal details in paragraph 3.3, the disclosure should also contain the following information:
- 3.4.1 Details of the person(s) involved;
  - 3.4.2 Details of the allegation such as nature, time and place;
  - 3.4.3 Other relevant information; and
  - 3.4.4 Any supporting evidence.
- 3.5 The whistleblower will be notified on the outcome of the disclosure after investigation.

#### **4. REVIEW OF THIS POLICY**

- 4.1 This Policy shall be reviewed and updated regularly to ensure that it remains relevant and appropriate at all times.
- 4.2 Any subsequent amendment to this Policy will require the approval of the Company's Board of Directors.