

# ADVANCE INFORMATION MARKETING BERHAD

200401006266 (644769-D)

(Incorporated in Malaysia)

## WHISTLEBLOWING POLICY AND PROCEDURES

This Policy is created to enable the Group to:

- i. Provide guidance to stakeholders in reporting suspected wrong doings, improper conducts and violations of regulations and laws; and
- ii. Undertake the responsibility in providing the protection to whistleblower against any reprisal.

### Reportable Violations:

This Policy is applied to the reporting of, but not limited to the following violations:

- i. Unauthorised access to confidential information;
- ii. Misappropriation of the Group's properties, assets or resources;
- iii. Breach of law and regulations;
- iv. Abuse of power, insider trading and money laundering;
- v. Fraud, corruption, bribery or violation of the Group's Anti-Corruption and Bribery Policy;
- vi. Engaging in conflict of interest transactions without disclosure;
- vii. Making fraudulent statements to authorities and shareholders;
- viii. Mislead, deceive, manipulate, coerce or fraudulently influence auditors in connection with examination, audit or review of any financial statements or records of the Group;
- ix. Concealment of information of malpractice or misconduct; and
- x. Any other incidents that may cause material financial losses or damage to the image of the Group.

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Stakeholders who know of any suspected violations or who wish to seek clarification on any reportable violations are encouraged to write to [aim@whistleblower.com.my](mailto:aim@whistleblower.com.my) for further information.

### Whistleblowing Channel:

In order to protect the confidentiality of whistleblower and to ensure the integrity of the information received through the whistleblowing channel, the Group will maintain an independent whistleblowing reporting channel to enable all reported cases to be directly channelled to the Chairman of Audit Committee.

### Principles of Whistleblowing:

The general principles governing the whistleblowing reporting procedures are as follows:

- Whistleblower is required to disclose his/her identity in order for the Group to accord the necessary protection to him/her;
- By reporting to the Group of any suspected wrong doings, the whistleblower shall assure the Group that the information disclosed or reported by him/her is not confidential information which have been disclosed or reported to any enforcement agencies;
- In order to protect whistleblower from any reprisal, the identity of the whistleblower will be treated with strictest confidence. However, whistleblower may under applicable laws and regulations be required to stand as a witness; and
- In addition to disciplinary actions, whistleblower will lose its protection if he/she is found making false or malicious allegations.

### Principles of Investigation:

All complaints will be acknowledged receipt within 48 hours.

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The Audit Committee will determine the action and investigation against the complaints received based on, *inter alia*, the severity of the misconducts and the credibility of the information received.

The Audit Committee is empowered by the Board to appoint investigator/professional party to review and pursue each complaint based to the extent of information and evidence received.

Upon completion of investigation, the Audit Committee shall:

- i. Inform the whistleblower of the status of the findings;
- ii. Initiate action against any persons who has committed improper conduct;
- iii. Lodge report to enforcement agencies for criminal offence; and
- iv. Ensure that measures are being taken to strengthen the organisational controls to prevent the re-occurrence of the wrong doing.

### **Review and Publication:**

The Board reserves its right to review and update this Policy to ensure its relevance and effectiveness in keeping with the changes in legislation and business environment. Revision to the Policy is subject to Board's approval before it published and notified in the corporate website.

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### WHISTLEBLOWING FORM

Whistleblower's/Reporter's Contact Information	
Name	
Designation	
Company Name	
Department	
Contact Number	
E-Mail Address	
Suspect(s)' Information	
Name(s)	
Designation(s)	
Company Name(s)	
Department(s)	
Witness(es) Information (if any)	
Name(s)	
Designation(s)	
Department(s)	
Contact Numbers	
E-Mail Address	
<p><b>COMPLAINT:</b> Briefly describe the misconduct / improper activity and how you came to 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.</p> <p>a) What is the nature of the misconduct / improper activity?</p> <p>b) When did it happen and when did you notice it?</p> <p>c) Where did it happen?</p> <p>d) Is there any evidence that you could provide to us? (Note: As a whistleblower, you <b>SHOULD NOT</b> attempt to obtain evidence for which you do not have a right of access since whistleblowers is <b>NOT</b> an investigator.)</p>	

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e) Any other comments?

I hereby confirm that the information reported here by me is not confidential information which have been disclosed or reported to any enforcement agencies that would cause breach of Section 8 of the Whistleblower Protection Act 2010.

Date:

Signature: