

P.A. RESOURCES BERHAD
Company No. : 200401026104 (664612-X)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY AND PROCEDURES

1. BACKGROUND AND PURPOSE OF WHISTLEBLOWING POLICY

P.A. Resources Berhad (“**Company**” or “**PA**”) is committed to the values of transparency, integrity, impartiality and accountability in the conduct of its business and affairs, and in its workplace.

For this purpose, the Company has developed procedures or mechanisms to facilitate: -

- a) reports by Whistleblowers of any suspected or actual Wrongdoings on a confidential basis;
- b) investigation of such reports by the Prescribed Officer; and
- c) protection against reprisal to Whistleblower who reported in good faith.

This Policy does not replace or affect the Company’s Code of Conduct or other policies and procedures established or to be established by the Company from time to time.

In this Policy, “**Group**” means P.A. Resources Berhad and its subsidiaries and “**Group Company**” means any company within the Group; “**Prescribed Officer**” means the person authorised to receive reports on Whistleblowing matters; “**Chairman**” means the Chairman of PA; “**Board of Directors**” means the board of directors of PA; “**Policy**” means this Whistleblowing policy, as may be revised and amended from time to time.

2. REPORTING PROCEDURES

- a) When to disclose

As soon as a Whistleblower becomes aware and reasonably believes in good faith that a Wrongdoing is likely to happen, is being committed or has been committed, the Whistleblower is encouraged to make a report of the Wrongdoing.

The Whistleblower needs to demonstrate that the Whistleblower has reasonable grounds for the concerns. However, the Whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure. If the Whistleblower knows as a matter of fact that there are reasonable grounds of suspicion that a Wrongdoing is going to take place, such genuine concerns is encouraged to be raised at an early stage.

b) How to make a report

A disclosure of a Wrongdoing can be made to the following persons via email or by letter as set out below: -

1. Senior Independent Director: Wang Sze Yao @ Wang Ming Way
2. Senior Independent Director: Yap Fatt Lam

i) Via email:

1. Senior Independent Director: arthur@awl-law.com
2. Senior Independent Director: yfl@yfl.com.my

ii) Via letter addressed to the abovenamed persons and delivered to Lot 424 & 440, Jalan Kuala Selangor, Kampung Batu 8, Ijok, 45620, Kuala Selangor, Selangor

In order for the Company to investigate the Wrongdoing reported, the Whistleblower is to provide the following particulars in the report: -

- particulars of Whistleblower i.e. name, NRIC No., designation (if the Whistleblower is an employee of any Group Company) and contact particulars (email, telephone or mobile number and/or address);
- details and description of the Wrongdoing, including, its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if Whistleblower is not able to identify the identity of the person(s) involved;
- particulars of witnesses, if any; and
- particulars or production of documentary evidence, if any.

The personal details provided by the Whistleblower will be kept confidential. The Whistleblower may be asked to provide further clarification and information from time to time, during the course of investigation.

3. INVESTIGATION

- a) The Prescribed Officer who receives the report will assess the report to determine whether it is related to a Wrongdoing or excluded from the scope of this Policy and shall make general recommendations to the Chairman. The Chairman may designate any person, from the Group or external party, to conduct any investigation or to carry out any other process pursuant to this Policy (for instance, any meeting or an internal audit).

- b) The Chairman has the authority to make the final decisions including, but not limited to, any of the following:
- rejection of the report;
 - directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
 - resolution without recourse to an investigation;
 - directing investigations on the report and any persons involved or implicated;
 - suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact finding or to avoid any employee's exposure to threat or harm;
 - obtaining any other assistance (for instance, external auditors or legal advice); and
 - referral to the police or any other appropriate enforcement authority.
- c) It is intended that the disclosures by the Whistleblower will be acted upon in a timely manner.
- d) The Whistleblower and the alleged wrongdoer are expected to give their full cooperation in any investigation or any other process carried out pursuant to this Policy. They may be asked to attend a meeting to discuss the allegations and must take all reasonable steps to attend the meeting. The alleged wrongdoer will be given an opportunity to answer the allegations at the meeting.
- e) The Whistleblower will be informed of the result of any investigation or action or decision taken by the Company as soon as practicable.

4. **CONFIDENTIALITY**

- a) Reasonable steps will be taken to maintain the confidentiality of the Whistleblower and report made by the Whistleblower, unless:-
- The Whistleblower expressly agrees otherwise, and provides his agreement in writing; or
 - Otherwise required by law.
- b) The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties information regarding the Wrongdoing or any part thereof, including the status or outcome of an investigation into it, except:
- to those who are authorised under this Policy;
 - by lodging a report with an enforcement agency in accordance with the Whistleblower Protection Act 2010 or any other prevailing law;
 - if required by law; and
 - on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.