

BATU KAWAN BERHAD

196501000504 (6292-U)

GROUP WHISTLEBLOWING POLICY

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1. INTRODUCTION AND DEFINITION

- 1.1. Batu Kawan Berhad (“Company”) and its group of companies (collectively “Group”) are committed in ensuring the high standards of integrity from all its stakeholders. The Group views seriously any wrongdoing on the part of any of its stakeholders and as a means to ensure that the standards by which the Group subscribes to are upheld and maintained.
- 1.2. This Group Whistleblowing Policy (“Policy”) establishes a framework where stakeholders can raise in confidence possible corporate misdemeanours.
- 1.3. Stakeholders include employees, business partners, customers, contractors, suppliers, trading and joint-venture partners, shareholders and members of the public, where relevant.
- 1.4. For the purpose of this Policy, whistleblowing is defined as:

“The disclosure of information or activities by a person who has, or had, access to data, events, or information regarding actual, suspected, or anticipated wrongdoing—whether by employees, members of the Company, or those under its control—relating to individual or organisational malpractice. This includes actions that are deemed illegal, unethical, or improper.”

The ‘whistleblower’ is the person who makes such report.

2. SCOPE OF POLICY

- 2.1. The Policy is applicable to all stakeholders of the Company, its subsidiaries¹ and associates.
- 2.2. The Policy shall be read in conjunction with the relevant laws and regulations of the respective countries where we operate and in the event of any conflict with this Policy, the laws and regulations of the said country shall prevail.

3. PURPOSE

- 3.1. The Policy provides an avenue to raise a legitimate concern about the actual or suspected improprieties at the earliest opportunity for expeditious investigation.
- 3.2. The whistleblowing channel has been created to help stakeholders raise their concerns, without fear of retaliation and provide protection from reprisals and victimisation in respect of whistleblowing which is done in good faith.
- 3.4. This Policy is not intended to replace in any way and is in addition to the existing grievance or complaints procedures established relating to personal grievances concerning an individual’s terms and conditions of employment, performance assessments or other aspects of the working relationship.

¹ this Policy does not apply to Kuala Lumpur Kepong Berhad (“KLK”) (a subsidiary of the Company by virtue of *Malaysian Financial Reporting Standards* framework and a listed company on Bursa Malaysia) and its group of companies as KLK has its own separate Policy where their relevant parties will adopt KLK Policy.

4. REPORTABLE INCIDENTS

4.1. Anyone who makes a disclosure must reasonably believe that:

- (a) They are acting in the Group's best interest and/or public interest;
- (b) The disclosure tends to show past, present or future wrongdoing that may but not be limited to the following:
 - (i) concerns about the operational, accounting, internal control, omission of duties or auditing matters;
 - (ii) criminal offences (may include financial impropriety such as fraud, corruption, theft, malpractices, and/or misuse of the Group's properties, assets, or resources);
 - (iii) failure to comply with an obligation set out in law of the land, rules, regulations, policies and practices;
 - (iv) conduct which is an offence or breach of law;
 - (v) conflict of interest;
 - (vi) miscarriages of justice;
 - (vii) misappropriation of assets;
 - (viii) misuse and/or unauthorised disclosure of confidential information;
 - (ix) breaches of the Group's policies which may include but not limited to the following:
 - endangering someone's health and safety;
 - sexual harassment;
 - acts that cause negative effects to the environment and communities;
 - fraud against investors or the making of fraudulent statements to the stock exchange regulators, investors, government/state authorities and general public;
 - deliberate efforts to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external accountant or auditor in connection with preparation, examination, audit or review of any documents of the Group. This includes providing false or misleading information (including suppression or wilful omission of any material facts or information);
 - any other matters which can cause losses to the Group and/or damage to its reputation; or
 - covering up or abetting in any wrongdoing with regards to any of the aforementioned matters.

4.2 If an employee is aware of any wrongdoing committed by another employee of the Group, the Group expects such wrongdoing to be reported, and the complainant will be protected against reprisal. However, if such employee fails to do so, he or she may be considered as a complicit in the wrongdoing and bear some blame for the harm to the Group.

5. PROTECTION AGAINST REPRISALS

- 5.1. Anyone filing a written complaint concerning a wrongdoing or suspected wrongdoing must act in good faith and have reasonable grounds to believe that the information and allegations are substantially true.
- 5.2. All genuine whistleblowing done in good faith under the Policy and to the extent permitted by the prevailing laws, will be protected against any loss or retribution in connection with the disclosure. The whistleblower who commits a genuine mistake with regards to the disclosure will similarly be protected.
- 5.3. The Group shall not tolerate any direct or indirect harassment, discrimination or victimisation (including informal pressure) against the whistleblowers and shall take the appropriate action to protect them.
- 5.4. On the other hand, employees of the Group who deliberately made any allegation that found to be malicious/false may be subjected to disciplinary action.

6. CONFIDENTIALITY

- 6.1. The Group encourages whistleblowers to identify themselves when reporting. All information provided shall be treated with confidentiality.
- 6.2. There may be situations where the Group would need to disclose the confidential information provided by the whistleblower which may include but not limited to the following circumstances:
 - (a) Where the Group is under a legal obligation to disclose the information provided;
 - (b) When the information is readily available in the public domain;
 - (c) Where the information is given on strict confidential basis to legal or auditing professionals with the purpose of seeking professional advice; or
 - (d) Where the information is provided to the authorities for possible criminal investigation.

7. PROCEDURE FOR RAISING A CONCERN AND/OR MAKING A REPORT

7.1. Reporting Methods

7.1.1 Option 1

Report to immediate supervisor/superior, manager or Head of Department (where applicable).

7.1.2 Option 2

If the matter raised involves the above persons, or if you prefer that they not be told, you may report to the following designated officers:

- (a) Managing Director of the Company; or
- (b) Chairman of the Audit and Risk Committee of the Company.

7.1.3 Option 3

You may also submit your complaint in a sealed envelope clearly marked "Private & Confidential" and post it to the Company's Head Office at the following address:

*Batu Kawan Berhad
Wisma Taiko, No. 1, Jalan S.P. Seenivasagam,
30000 Ipoh, Perak, Malaysia*

*Attention: [Designated officers mentioned in item 7.1.2,
where applicable]*

7.1.4 Option 4

A report can also be made through Chemical Company of Malaysia Berhad (a subsidiary of the Company) e-form, CCM Integrity Hotline which is accessible on the subsidiary's website at www.ccmberhad.com.

7.2 How to make a report:

- 7.2.1 Ideally, the concerns should be raised in writing or alternatively via email to integrity@bkawan.com.my.
- 7.2.2 If the whistleblower is uncomfortable to submit the complaint in writing, arrangement can be made to meet the aforementioned personnel as stated in item 7.1.2.
- 7.2.3 Anonymous report or complaint is discouraged. However, such report will still be reviewed if it contains enough evidence or merits to commence investigation.
- 7.2.4 Whistleblower may choose to submit a report that addresses the information and questions set out in the attached **Appendix 1**.
- 7.2.5 Whistleblower may be requested to assist when more information is needed during the investigation of the complaint.

8. REVIEW AND AMENDMENTS TO THE POLICY

- 8.1 This Policy may be reviewed at the Company's absolute discretion and amendments may be made where necessary or appropriate.

Private & Confidential

BATU KAWAN BERHAD GROUP WHISTLEBLOWING REPORTING GUIDELINES AND QUESTION

1. Are you a BKB Group employee? *Adakah anda kakitangan Kumpulan BKB?*
() Yes, I am an employee of BKB Group. *Ya, saya adalah kakitangan Kumpulan BKB.*
() No, I am an external party (eg. vendor, etc). *Tidak, saya dari pihak luar (contohnya, pembekal)*
2. Do you wish to remain anonymous? *Adakah anda mahu kekal tanpa nama?*
() Yes. *Ya.* → go to question 7 / *terus ke soalan 7.*
() No. *Tidak.* → go to question 3 / *terus ke soalan 3.*
3. Name *Nama*

4. Email *Emel*

5. For BKB Group employee, please state your Department/Operating Centre.
Bagi kakitangan Kumpulan BKB, sila nyatakan Jabatan/Pusat Operasi.
For external party, please state your Company Name. *Bagi pihak luar, sila nyatakan Name Syarikat anda.*
6. Contact Number *Nombor telefon*

7. Subject *Tajuk*

8. Details of allegation. Please describe in detail with as much specific factual information as possible (eg. identity of those involved in the incident, date, time, place of incident etc)
Perincian rungutan. Sila huraikan secara terperinci dengan seberapa banyak maklumat fakta yang khusus dan jelas (contohnya identiti individu yang terlibat dalam kejadian, tarikh, masa, tempat kejadian dan lain-lain)

9. Are there any additional details and evidence that you would like to submit (eg. document, photograph, voice recording, videos etc)? *Adakah anda ingin menyerahkan butiran dan bukti lain yang berkaitan (contohnya dokumen, gambar, rakaman suara, video dan lain-lain)?*

(☐) Yes *Ya*

(☐) No *Tidak*

If so, please send them via one of the following methods: *Sekiranya ya, sila salurkan melalui salah satu cara berikut:*

Email *Emel:* *integrity@bkawan.com.my*; or *atau*

By post *Pos:* Batu Kawan Berhad, Wisma Taiko, No. 1, Jalan S.P. Seenivasagam, 30000 Ipoh, Perak

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GROUP WHISTLEBLOWING POLICY DOCUMENT VERSION CONTROL	
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