JCY INTERNATIONAL BERHAD
[Registration No. 200501031285 (713422 X)]
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY AND PROCEDURES

1. Purpose

This Whistleblowing Policy and Procedures ("**Policy**") is intended to address whistleblowing in JCY International Berhad ("**Company**" or "**JCY**") and all subsidiary companies within the JCY Group.

The JCY Group is committed to maintaining high standards of corporate governance and integrity in the conduct of its business activities. In line with this, the Board of Directors ("**Board**") and the Management of JCY must maintain a workplace that practices good governance in all its operational activities and business dealings. Whistle-blowing is a platform to empower employees and other stakeholders to report any genuine concerns about the wrongdoing that they may have observed within the JCY Group.

This Policy is implemented to:

a) Provide an avenue for all employees and other stakeholders to disclose any improper conduct or any action that is or could be harmful to the reputation of the JCY Group and/or compromise the interest of stakeholders;

b) Provide a proper internal reporting channel to disclose any improper or unlawful conduct in accordance with the procedures as provided for under this Policy;

c) Address any disclosure in an appropriate and timely manner;

d) Provide protection for the whistle-blower from reprisal as a direct consequence of making a disclosure and to safeguard such person's confidentiality;

e) Treat both the whistle-blower and the alleged wrongdoer fairly; and

f) Encourage all employees to talk to supervisors, managers and other appropriate personnel when they are in doubt about the best course of action in a particular situation.

Whistle-blowing is an act of voluntary disclosure/reporting for appropriate action(s) to be taken in response to any improper conduct committed or about to be committed by an employee, officer or management of the JCY Group.

This Policy shall also similarly apply to any vendors, partners, associates or any individuals, including the general public, in the performance of their assignment or conduct of business with the JCY Group.

2. Whistle-Blower

The whistle-blower's role is as a reporting party. He/She is not an investigator or finder of fact, or determiner of the appropriate corrective or remedial action that may be warranted. The whistle-blower does not have a right to participate in any investigative activities unless requested by investigators.

A whistle-blower includes any of the following:-

- employees, including employees on contract terms, temporary or short-term employees and employees on secondment within the JCY Group, where applicable.
- people performing services for the JCY Group, including contractors and service providers.
- members of the public who are natural persons, not being incorporated or unincorporated bodies.

[hereinafter referred to as "**Person(s)**"]

3. Reporting procedures

This Policy is intended to complement the normal channels of communication and reporting lines within the JCY Group. Persons shall first consult or raise their concerns with their immediate supervisors or heads or liaison contact points, where appropriate. However, if their complaints or concerns remain unresolved, this Policy provides a facility for such Persons to make formal disclosures to be escalated to the relevant whistle-blowing channel.

i. <u>What to disclose</u>

A disclosure may be made if it relates to one or more of the following wrongdoings by any person in the conduct of the JCY Group's business or affairs:-

- acceptance of favour
- corruption, bribery or fraud
- criminal offence
- misuse of the JCY Group's funds or assets
- gross mismanagement within the JCY Group
- serious financial irregularity or impropriety within the JCY Group
- serious breach of the JCY's Code of Conduct
- religious, racial, sexual, disability forms of discrimination
- an act or omission which creates a substantial or specific danger to the lives, health, or safety of the JCY Group's employees, the public or the environment
- failure to comply within the provisions of other laws and regulations where the wrongdoer, knowingly, disregards or does not comply with such provisions
- knowingly directing or advising a person to commit any of the above wrongdoing conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)

ii. <u>When to disclose</u>

A whistle-blower shall come forward with any information or document that he or she, in good faith, reasonably believes discloses a wrongdoing, which is likely to happen, is being committed or has been committed.

The whistle-blower needs to demonstrate that he/she has reasonable grounds for the concerns. However, the whistle-blower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure. If the whistle-blower knows as a matter of fact that there are

reasonable grounds of suspicion that a wrongdoing is going to take place, such genuine concerns shall be raised at an early stage.

iii. How to proceed

- All disclosures pursuant to this Policy are to be made as follows:-

No.	Name	Contacts
1.	YBhg. Wong King Kheng *(Chairman of the Board of Directors)*	Email: chairman@jcyinternational.com
2.	Mr. Lai Kuan Loong, Victor *(Senior Independent Non-Executive Director)*	Email: senior-ined@jcyinternational.com

- A disclosure shall include at least the following particulars:

  - his/her name, designation, current address and contact numbers;
  - basis or reasons for his/her concerns, for instance, its nature, the date, time, and place of its occurrence and the identity of the alleged wrongdoer;
  - particulars of witnesses, if any; and
  - particulars or the production of documentary evidence, if any.

  The whistle-blower may be asked to provide further clarification and information from time to time, for example, if an investigation is conducted.

- If the disclosure involves a Director, the disclosure shall be referred directly to the Board of Directors who shall then be responsible for the investigation and recommendation to the Board of Directors of JCY. The Board of Directors has the authority to make final decisions.

4. Being informed and having the opportunity to be heard

The whistle-blower shall be informed of the status of his/her disclosure matter as far as reasonably practicable. The whistle-blower and the alleged wrongdoer are expected to give his/her full cooperation in any investigation or any other process carried out pursuant to this Policy.

The whistle-blower, and if applicable, the alleged wrongdoer shall be notified in writing of the decision on the wrongdoing (e.g. whether the wrongdoing occurred or not; or whether the alleged wrongdoer is guilty or not), and the basis thereof.

5. Consequences of wrongdoing or wrongful disclosure

If the Person (i.e. the whistle-blower) of JCY has, or is found to have:-

- committed a wrongdoing
- taken serious risks which may likely cause a wrongdoing to be committed
- made a disclosure not in accordance with the requirements of this Policy (for instance, dishonest, mischievous or malicious complaints)
- participated or assisted in any process pursuant to this Policy otherwise than in good faith,

the corrective actions to be taken against that Person shall be determined by the Chairman of the Board, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services with the JCY Group or monetary or other forms of punishment.

6. Protection under this Policy

Upon making a disclosure in good faith, based on reasonable grounds and in accordance with the procedures pursuant to this Policy:-

- the whistle-blower shall be protected from reprisal within the JCY Group as a direct consequence of his/her disclosure
- the whistle-blower's identity shall be protected, i.e. kept confidential unless otherwise required by law or for the purpose of any proceedings by or against any company in the JCY Group

7. Acting in Good Faith

Only genuine concerns should be reported under this Policy. The report should be made in good faith with a reasonable belief that the information and any allegations are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and if proven may lead to appropriate disciplinary action, up to and including legal action, where appropriate.

8. Review and revision to the Policy

This Policy shall be reviewed, at the Board's discretion, and amended from time to time, as and when necessary, to ensure its relevance and effectiveness in keeping with the JCY Group's changing business environment, administrative or operational needs as well as changes to legislations. Changes to this Policy, if any, shall only be made with the Board's approval in writing.