

AFSB WHISTLEBLOWING POLICY STATEMENT

Policy Statement

AFSB Group is committed to promote and maintain high standards of transparency, accountability, ethics and integrity at the workplace.

This Policy is designed to support the Company's Shared Values and facilitate employees' and Third Party's concerns about possible improprieties at the earliest opportunity to ensure that concerns can be raised without fear of reprisal or Detrimental Action, as far as practicable.

Objectives

- i) Provide employees and Third Party dealing with the Company with proper avenue and procedures to disclose, in good faith, cases of Improper Conduct;
- ii) Manage disclosures of Improper Conduct in accordance with proper process without compromising the confidentiality and identity of the Whistleblower;
- iii) Protect Confidential Information of the Whistleblower and provide protection against Detrimental Action within the Company to the extent reasonably practicable, that may result from the disclosure of Improper Conduct; and
- iv) Provide fair treatment to both the Whistleblower and the alleged wrongdoer when a disclosure of Improper Conduct is made.

Disclosure of Improper Conduct

The Whistleblower needs to demonstrate that he or she has reasonable belief of the Improper Conduct and must undertake such disclosure or reporting in good faith, for the best interest of the Company and not for personal gain or motivation.

A disclosure of Improper Conduct may be made in writing via e-mail to whistleblowing@alamflora.com.my

Scope of the Policy

This Policy applies to all directors and employees of the Company, including employees on contract, temporary or short-term employees and employees on secondment, and Third Party who have knowledge of or genuinely suspects, in good faith and on a reasonable belief, that any director or employee of the Company has engaged, is engaging or is preparing to engage in any Improper Conduct which includes, but not limited to, the following:

- i) Criminal offences including criminal breach of trust, extortion, blackmail, sabotage, unlawful acts, fraud, corruption, bribery, theft or embezzlement etc.;
- ii) Failure to comply with legal or regulatory obligations;
- iii) Misuse of the Company's funds or assets;
- iv) Breach of Group Policies and Code of Conduct;
- v) Misuse of confidential information;
- vi) An act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
- vii) Unsafe work practices or substantial wasting of Company's resources;
- viii) Abuse of power by an officer of the Company;
- ix) Conflict of Interest; and
- x) Concealment of any of the above.

Confidentiality and Whistleblower Protection

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

- i) The Whistleblower's identity and such other Confidential Information of the Whistleblower shall be protected and remain confidential; and
- ii) Whistleblower who is an employee shall be protected from Detrimental Action within the Company, as a direct consequence of the disclosure.

A Whistleblower may lodge a complaint to the Company of any Detrimental Action committed against the Whistleblower by any personnel of the Company.

The Whistleblower protection conferred under this Policy is not limited or affected notwithstanding that the disclosure of the Improper Conduct does not result in any disciplinary action or criminal charges against the person whom the disclosure was made.

Any disclosure of Improper Conduct made to the Designated Person without the identity of the individual who made the disclosure, shall not be accorded with protection under this Policy.

Nothing in this Policy shall prevent the Whistleblower from reporting the misconduct to the enforcement body/ agency after the disclosure is made, provided that the Whistleblower shall notify the Designated Person in writing of the reporting made to the enforcement body/ agency.

Revocation of Whistleblower Protection

The Whistleblower protection provided pursuant to this Policy may be revoked if it is of the opinion, based on an investigation or in the course of an investigation that:

- i) The Whistleblower himself has participated in the Improper Conduct disclosed, except in instances where:
 - a) The participation was under duress; or
 - b) In the view of the Company, the participation could be justified under the circumstances;
- ii) The Whistleblower willfully made in his disclosure of Improper Conduct a material statement which he knows or believes to be false or did not believe to be true;
- iii) The disclosure is made solely with the motive of avoiding dismissal or other disciplinary action;
- iv) The Whistleblower has made disclosures of Improper Conduct to other parties and not through the Designated Person authorized under this Policy;
- v) The disclosure of Improper Conduct is frivolous and/or vexatious; and/or
- vi) The Whistleblower, in the course of making the disclosure or providing further information, breaches the provisions of this Policy.

If the Whistleblower protection has been revoked, a written notice shall be given to the Whistleblower of the revocation.

Administration

The BAC has the overall responsibility for this Policy and the Head of IAD is responsible for the administration and implementation of this Policy.