WHISTLE BLOWER POLICY

Overview;

To describe and provide an avenue or course of action an employee, customers, suppliers or third parties, can take to escalate any wrong doing including fraud, favors any acts to deceive for monetary gains or otherwise act to discredit or cheat committed by the Management and employees of ALCOM.

All reports and information received shall be treated with strict confidentiality.

The identity of a whistleblower who made a disclosure in good faith will be kept confidential and will only be disclosed on a strictly need-to-know basis. Employees who whistle blow in good faith will also be protected by ALCOM from any repercussion.

If there is a need to disclose a whistleblower's identity for any reason (e.g. to facilitate investigation or required by relevant authorities like the police), the whistleblower's consent may be sought.

Purpose;

a. Good faith

It is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true. Good faith is lacking when the disclosure is known to be malicious or false.

b. Wrongdoing

Include but are not limited to fraud, financial fraud, violation of laws, regulations, company policies, unethical behavior or practices, endangerment to public health or safety and negligence of duty.

c. Employment Action

Include but are not limited to demotion, suspension, termination or any other punishment deemed fit.

Procedures;

Below are the reporting channel based on the categories;

Audit Committee Chairman

Ms Lam Voon Kean lamvoonkean@alcom.com.my

Management Team & above

President

Mr Heon Chee Shyong chee-shyong.heon@alcom.com.my

