



WHISTLE BLOWING

KEY ATTRIBUTES

- Hosted by local HR Department
- Ability to report anonymously (phone or internet)
- Ability to report in English & Bahasa
- Ability for individuals to follow up on reports (even if reported anonymously)

CATEGORIES OF REPORTING

- Accounting/Audit Irregularities
- Conflicts of Interest
- Customer Relations
- Discrimination
- Employee Relations
- Falsification of Company Records
- Fraud
- Fraudulent Insurance Claims
- Improper Loans to Executives
- Insider Trading
- Policy Issues
- Product Quality Concern Release of Proprietary Information
- Retaliation of Whistleblowers
- Safety Issues and Sanitation
- Sexual Harassment
- Substance Abuse
- Theft of Cash
- Theft of Goods/Services
- Theft of Time
- Unauthorized Discounts
- Wage/Hour Issues
- Workplace Violence/Threat

The ALCOM reporting Protocols are as follows:

1. Plant Director
2. HR Manager
3. President/CEO

ALCOM has an open door policy. Employees can report concerns free retaliation.

REPORTING PROCESS FLOW

1. Employee makes a report via the Internet (email) or by Phone.
2. The representative captures the details of the concern and sends a report to the Chairman Audit Committee to assist with the investigation.
3. The Administrators determine next steps, including what type of follow up or investigation should be performed and whom to involve at the plant/office
4. Reasonable steps are taken to protect the confidentiality of the employee who reported the concern. Employees have the option of reporting anonymously, however if names and location are shared then they may be used during the course of the investigation.
5. Status of the incident report is updated on tracking file of case management system.
6. Ethics direct numbers
 - i. 03-33466330 (Asst. Manager – IR) Ishak.sharri@alcom.com.my
 - ii. 03-33466355 (HR Manager) KhairulNizam.Yub@alcom.com.my
7. The contact person for any disclosures for Managers and above would be the Audit Committee Chairman, Ms Lam Voon Kean. He will be our independent liaison that has been authorized by Alcom’s Board of Directors as part of the whistleblowing policy execution for the Group.
 - i. Email : lamvoonkean@alcom.com.my