

**OVERSEA ENTERPRISE BERHAD (317155-U)**  
**(Incorporated in Malaysia)**

**WHISTLE BLOWING POLICY**

<b>Content</b>	<b>Page</b>
1. OBJECTIVES	2
2. SCOPE	2
3. REPORTING PROCEDURE	2
4. ACTIONS	3
5. REVIEW OF WHISTLE BLOWING POLICY	3

## 1. OBJECTIVES

Oversea Enterprise Berhad and its subsidiaries (the Group) is committed to promoting and maintaining high standards of transparency, accountability and ethics in the workplace and proper business behaviour which is vital to the integrity and success of the organisation.

This whistle blowing policy is designed to provide employees or stakeholders (shareholders, customers and suppliers) with proper internal reporting channels and guidance to raise genuine concerns on any wrongdoing or improper/unlawful conduct, inappropriate behaviour or malpractices within the Group or any action that could be harmful to the reputation of the Group or compromise the interests of the shareholders, stakeholders and the public.

## 2. SCOPE

- i. This Policy covers all matters involving the Group's employees and any other person providing services to the Group, including adviser, vendor, consultant, independent service provider, external agencies or any other party who has business relationship with the Group.
- ii. Employees may disclose to the authorised personnel (Refer to Reporting Procedure below) of any wrongdoing or improper conduct within the Group which he has become aware of or genuinely suspects based on his reasonable belief that any person has engaged, is engaged or is preparing to engage in. Any employee who discovers or suspects any wrongdoing or improper conduct should not attempt to conduct investigations personally or interrogate any suspect.

## 3. REPORTING PROCEDURE

All employees of the Group have a duty to report concerns for malpractice, illegal act or omission of work by any employee of the Group.

Any concern should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Group General Manager as follow:-

Name:	:	Mr. Yap Teck Beng
Email	:	tbyap@oversea.com.my
Mail	:	Oversea Enterprise Berhad, D-3-1 & D-3A-1, Seri Gembira Avenue, Jalan Senang Ria, Taman Gembira, 58200 Kuala Lumpur. (Please mark "Strictly Confidential")

In case where reporting to the management is a concern, then the report should be made to the Chairman of the Audit Committee. Channel of reporting to the Chairman of the Audit Committee is:

Name:	:	Mr. Koong Lin Loong
Email	:	llkoong@llkg.com.my
Mail	:	Oversea Enterprise Berhad, D-3-1 & D-3A-1, Seri Gembira Avenue, Jalan Senang Ria, Taman Gembira, 58200 Kuala Lumpur. (Please mark "Strictly Confidential")

#### **4. ACTIONS**

- i. All reports will be investigated promptly by the authorised person receiving the report. If required, he may seek assistance from the legal adviser or the Human Resource Department. He may also co-opt with any other employee(s) from time to time to assist.
- ii. All reports received anonymously will be treated with confidentiality.
- iii. The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as it's permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
- iv. All matters reported will be reviewed and if required, investigated by the authorised person within reasonable timeframe.
- v. Upon completion of investigation, the authorised person will prepare and endorse the investigation report and give recommendation to the Board of Directors and Audit Committee for their deliberation. Decision taken by the Board will be implemented immediately.
- vi. Where possible, proper steps will also be implemented to prevent similar situation arising.

#### **5. REVIEW OF WHISTLE BLOWING POLICY**

This policy shall be reviewed periodically by the Board in accordance with the needs of the Company.