



PROGRESSIVE IMPACT CORPORATION BERHAD

(Company No: 203352-V)

(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1. Objective of the Policy

The objective of this Whistleblowing Policy is to provide an avenue for staff to disclose their concerns involving any improper conduct within the Group in accordance with the procedures provided herein.

2. Scope of the Policy

For the purpose of this Policy, “staff” includes all directors, officers, employees and other individuals who are engaged by the Company or any of its subsidiaries.

The Company encourages staff with serious concerns about any aspect of the Group’s business to come forward and voice those concerns. Only genuine concerns should be reported and concerns raised:

- must be made in good faith;
- the individual must believe the information to be substantially true;
- must not be a malicious or false allegation; and
- must not be made for personal gain.

Types of improper conduct shall include, but not be limited to:

- fraud;
- criminal breach of trust;
- abuse of power;
- illicit or corrupt practices;
- unauthorised use of the Company or any of its subsidiaries’ assets;
- conduct which is an offence or a breach of law, rules and regulations;
- breach of confidentiality or misuse of confidential information.

3. Procedures

If an individual has reasonable belief that a staff has engaged in improper conduct, the individual shall report such information to the Chairman of the Board or the Chairman of the Audit Committee. All reports and disclosures will be treated fairly and properly and addressed in an appropriate and timely manner.

The Chairman of the Board and the Chairman of the Audit Committee could be reached at:

Chairman of the Board	Chairman of the Audit Committee
Contact No: 019-8896716	Contact No: 019-8832538
Email: datuksyedhisham@picorp.com.my	Email: baharin@picorp.com.my

4. Confidentiality

The Company will treat all complaints by the reporting party as confidential, privileged and anonymous to the fullest extent permitted by law. If such confidentiality results in the inability to conduct a fair investigation or where disclosure is required by law, the individual will be informed in advance.

The Company will not tolerate harassment or victimisation of anyone raising a genuine concern. The Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. Any confirmed act of retaliation or victimisation against a whistle-blowing employee will result in disciplinary action being taken against the perpetrator, up to and including termination of employment.

The Company does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Company cannot obtain additional information from the appropriate staff. It is also more difficult to establish whether allegations are credible.

5. Disciplinary Action

If any allegation of misconduct is substantiated, appropriate disciplinary action will be taken against the responsible individual(s) in accordance with the Staff Manual. Suspected criminal activities will be investigated and prosecuted by the relevant authorities.

6. Untrue Disclosures

If an individual makes a disclosure in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, appropriate disciplinary action may be taken against that individual.

7. Exclusion

This Policy does not form part of the staff's contract of employment and the Company may amend it at any time.

Approved by the Board on 22 August 2016