



TIONG NAM

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WHISTLEBLOWING POLICY

POL-CORP-002

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WHISTLEBLOWING POLICY

1. Purpose

- 1.1. Tiong Nam Logistics Holdings Berhad including its subsidiaries, affiliates and/ or related companies (“the Company” or “we” or “us” or “our” or “Tiong Nam Group”) is committed to ensure its business and operations are conducted in an ethical, moral and legal manner.
- 1.2. This document sets out the Whistle Blowing Policy (“Policy”) that Tiong Nam Group has put in place to ensure that we can fulfil our commitment and provide an avenue for all staff, interns, consultants, contractors, vendors, suppliers and/or customers to disclose any illegal, unethical, questionable practices or improper conduct committed or about to be committed within Tiong Nam Group.
- 1.3. This Policy is intended to create a work environment where Employees, vendors, service providers, customers and other stakeholders are able to raise concerns on misconduct, irregularities or malpractices, without fear of harassment and/or victimisation and with an assurance that their concerns will be taken seriously and investigated, and the outcome duly communicated.
- 1.4. This Policy is also intended to encourage staff and other relevant stakeholders to report unethical or illegal conduct. Policy objectives include:
 - 1.4.1. Encourage timely reporting of alleged malpractices/misconduct;
 - 1.4.2. Provide a confidential channel for escalation of concerns without fear of reprisal;
 - 1.4.3. Ensure consistent and timely response to reported improprieties and awareness by whistle blowers of their options/rights;
 - 1.4.4. Ensure appropriate oversight by the Board of Directors;
 - 1.4.5. Serve as a means of preventing and deterring misconduct that may be contemplated;
 - 1.4.6. Protect the rights of Tiong Nam Group; and
 - 1.4.7. Promote a culture of openness, accountability and integrity.

2. Scope

- 2.1. This Policy applies to:
 - 2.1.1. All individuals working at all levels and grades, including senior management managers, officer, directors, Employees (whether permanent, fixed term of temporary), consultant, trainee, seconded staff, homeworkers, casual Employee and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as “Employee(s)” in this Policy).
 - 2.1.2. “Third-party representatives” which may consist of, but not limited to, customers, agents, consultants, distributors, business partners, contractors, agents, joint-venture partners.
 - 2.1.3. “External Parties” which are referred broadly to, but not limited to, members of the public or those who are impacted by various organisational or business activities of Tiong Nam Group.

3. Definitions

- 3.1. “Whistle Blowing” refers to a voluntary disclosure of individual or organisational malpractice by a person(s) who has privileged access to data, events, or information about an actual, suspected, or anticipated wrongdoing or malpractice within or by Tiong Nam Group that is within its ability to control.
- 3.2. There are two categories of whistle blowers:
 - 3.2.1. “Internal Whistle Blowers” refers to Employees who are expected to report incidents of misconduct involving peer, supervisor/superior or top management staff;
 - 3.2.2. “External Whistle Blowers” refers to customers, suppliers, service providers and other members of the public who report wrong doings of Employees.

4. Responsibility

- 4.1. All Employees regardless of grade, rank, or department must read understand and comply with this Policy.
- 4.2. All Employees are responsible to ensure the highest standards of ethics, honesty, openness and accountability in line with the Tiong Nam Group’s commitment to enhance good governance, transparency and safeguard the integrity of Tiong Nam Group.

5. Reportable incidents for whistleblowing

- 5.1. This Policy allows for reporting by Employees or External Parties to the Internal Audit / Compliance Division of Tiong Nam Group, without fear of reprisal, discrimination or adverse consequences.
- 5.2. It also permits Tiong Nam Group to address such reports by taking appropriate action(s), which may include, but are not limited to, disciplining or terminating the employment and/or services of those responsible.
- 5.3. Reportable incidents for whistleblowing include:
 - 5.3.1. All forms of financial or non-financial malpractices or impropriety such as fraud, corruption, bribery, embezzlement and/ or theft;
 - 5.3.2. Abuse and misrepresentation of power and authority;
 - 5.3.3. Harassment and intimidation, including sexual harassment;
 - 5.3.4. Failure to comply with laws and regulations;
 - 5.3.5. Discrimination on the basis of gender, race, disabilities;
 - 5.3.6. Serious conflict of interest without disclosure;
 - 5.3.7. Breach of Tiong Nam Group’s Policies and/ or Code of Conduct and Ethics;
 - 5.3.8. Concealing information about any of the above malpractice or misconduct.
- 5.4. The above list is not exhaustive and includes any act of omissions, which if proven, will constitute an act of misconduct under Tiong Nam Group’s Code of Conduct and Ethics and/ or possibly any criminal offence under the relevant legislations in force.

6. Reporting mechanisms

- 6.1. Tiong Nam Group encourages Employees and External Parties to put their names to their allegations whenever possible.
- 6.2. Concerns or irregularities expressed anonymously are more difficult to act upon effectively but they will be considered, taking into account the following:
 - 6.2.1. Seriousness of issues raised;
 - 6.2.2. Significance and credibility of concerns;
 - 6.2.3. Likelihood of confirming the allegation from attributable sources and information provided.
- 6.3. The whistle blower is responsible to ensure that the disclosure is made in good faith, free from malicious intent, and not for any kind of personal gain.
- 6.4. This Policy strictly prohibits frivolous, vexatious, mala fide, bogus disclosure for personal gain or with personal agenda. This is also not a channel for taking up any personal grievances.
- 6.5. All valid concerns or irregularities raised will be acknowledged and treated with confidence throughout the process.
- 6.6. Reports on any irregularity/ misconduct committed or about to be committed (including any criminal offence may be addressed to the following:

TIONG NAM LOGISTICS HOLDINGS BERHAD
Internal Audit Department
LOT 30462, Jalan Kempas Baru, 81200, Johor Bahru, Malaysia
Email: whistleblowing@tiongnam.com

7. Safeguards and protection to the whistle blower

- 7.1. A whistle blower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistle blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within Tiong Nam Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistle blower is mistaken as to the facts and the rules and procedures involved.
- 7.2. Tiong Nam Group prohibits any form of discrimination, retaliation or harassment against a whistle blower who submits a complaint or report in good faith. If a whistle blower believes that they are being subjected to discrimination, retaliation or harassment for having made a report under this Policy, they should immediately report those facts to the Managing Director. Reporting should be done promptly to facilitate investigation and the taking of appropriate action.
- 7.3. The party raising the report/ complaint may need to come forward as a witness at an appropriate time. If an Employee or External Party makes an allegation in good faith but it is not confirmed by the investigation, no action will be taken against him or her. If, however, an Employee has made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against him or her. Likewise, if investigations reveal that the External

Party making the complaint had done so maliciously or for personal gain, appropriate action, including reporting the matter to the police, may be taken.

8. Complaints handling and confidentiality

- 8.1. All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate to conduct the investigation and to take any remedial action, in accordance with any applicable laws and regulations.
- 8.2. Tiong Nam Group reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him or her and be provided with an opportunity to reply to such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.
- 8.3. Upon the completion of the whistleblowing process and procedures, non-anonymous whistle blowers will be accorded the privilege to be notified on the outcome of the disclosure, as well as actions taken where applicable, without divulging confidential information.
- 8.4. If, at the conclusion of an investigation, Tiong Nam Group determines that a violation has occurred or the allegations are substantiated, appropriate action(s) will be taken, including but not limited to disciplinary (for Employees) and/ or referring the matter to the police where applicable.

9. Withdrawal of disclosure or report

- 9.1. A whistle blower who wishes to withdraw their disclosure is required to write to whistleblowing@tiongnam.com, together with supporting reason(s) for the withdrawal.
- 9.2. Notwithstanding such withdrawal, Tiong Nam Group reserves the right to proceed with investigation on the matters arising from the disclosure.

10. Queries

- 10.1. If you have any queries or complaints in relation to this Policy or whistle blowing generally, you should contact Tiong Nam Group's Compliance Office at whistleblowing@tiongnam.com. The Compliance Officer or a person to whom he or she has delegated certain responsibilities, will respond to your query or complaint, investigate the complaint or request from you, additional information in order to do so.

11. Approvals and variation

- 11.1. This Policy has been approved by Tiong Nam Group's Board of Directors. Tiong Nam Group's Board of Directors is the sponsor for this Policy and must approve any changes to it. This Policy may be updated from time to time. Please ensure that you refer to the latest version of the Policy made available to all Employees.