

Whistleblowing Policy

This Policy applies to Kejuruteraan Semangat Maju Sdn Bhd and its subsidiaries, affiliates, associated entities and any of their branches and offices (collectively or individually “**KSM**”).

1.0 What is Whistleblowing?

KSM is committed to maintaining transparency, accountability, and integrity in all its operations. This policy provides a formal process for employees and stakeholders to confidentially report any concerns about **illegal, unethical behaviour, unfair treatment or harmful activities** within the organization and allow individuals to raise concerns in a safe and confidential manner to prevent wrongdoing and protect the interests of all parties.

2.0 Who is a Whistleblower?

A **whistleblower** is any individual who, in good faith, reports suspected misconduct, fraud, or violations of laws and company policies. This can include:

- Employees (current and former / full-time, part-time, intern)
- Contractors and suppliers
- Customers or other stakeholders

Whistleblowers play a crucial role in ensuring that organizations operate ethically and in compliance with laws.

3.0 Scope of Whistleblowing

This policy covers, but not limited to, the following types of concerns:

3.1 Personal Grievances (Employee-focused)

- **Unfair treatment, favoritism, or unjust disciplinary actions** - Being treated differently without valid business or performance-related reasons
- **Harassment, Discrimination or Bullying** – Verbal, physical, or psychological mistreatment in the workplace
- **Violations of company policies or ethical concerns** - Disregard company’s internal rules, code of conduct, or expected standards of behavior that affects the employee or organisation directly
- **Any other employment-related concerns** - Any other valid concerns that impact the employee’s role, well-being, or professional development in an organization

3.2 Organizational Misconduct (Company-Focused)

- **Fraud, Corruption, or Bribery** – Deception or unethical behavior for personal or company gain
- **Theft or Misuse of Company Resources** - Stealing or using assets for personal use
- **Breach of Health and Safety Regulations** - Ignoring or violating rules that protect employee safety
- **Environmental Violations** – Acts that harm the environment or breach environmental laws
- **Data Breaches** – Unauthorized disclosure of confidential information
- **Conflict of Interest** – Favoritism, undisclosed relationships

4.0 Reporting Mechanism

Whistleblowers can report concerns through the following channels:

| | |
|----------------------------|--|
| Email | : whistleblowing@ksmgroup.co |
| Hotline | : +603-8084 1870 |
| Anonymous Reporting | : Secure online form available on the company's website or via the QR code below |



Whistleblower Reporting Form

The submission of complete information is important and helps in investigations. Please provide the following, where possible:

- i. Name(s) of person(s)/company(ies) involved
- ii. Date, time and location of incident
- iii. Frequency of occurrence of the incident
- iv. Physical evidence
- v. Details of incident
- vi. Any other information that may substantiate the feedback/complaint

All reports will be treated confidentially, and whistleblowers may choose to remain anonymous.

5.0 Protection for Whistleblowers

5.1 KSM is committed to creating a safe and transparent environment where anyone can report concerns without fear of retaliation. Any individual who makes a report in good faith will be protected. This includes:

- Protection from dismissal, demotion, discrimination or victimization (such as deliberate isolation, unfair treatment, hostile work conditions, or the assignment of unreasonable tasks in retaliation for speaking up)
- Freedom from harassment or intimidation
- Confidentiality of the whistleblower's identity
- Support and fair treatment throughout the investigation process
- Protection against unfair job consequences, threats or disciplinary action

5.2 KSM implements preventive measures, which may include:

- Leave of absence (with pay) during the investigation, if necessary

- Temporary reassignment or relocation to another team or department
- Confidential handling of identity to the maximum extent possible
- Support via HR or an independent contact point throughout the process

5.3 Protection from Legal Consequences

If a whistleblower has reported a concern in good faith, even if it turns out to be unproven, they will not face any legal or disciplinary consequences for the act of reporting. However, false reports made maliciously or knowingly with wrong intent may result in disciplinary action.

5.4 Compensation and Remedies

In cases where a reported issue is proven to be true, KSM may provide:

- i. Compensation or support to the individual who suffered harm (e.g. loss of promotion, harassment)
- ii. Restorative measures, such as restoring lost benefits, issuing a public clarification, or formally acknowledging the wrongdoing
- iii. Counseling or access to external support services, if psychological distress occurred due to the misconduct or the reporting process
- iv. Each case will be assessed individually by the Whistleblowing Committee or relevant panel, and remedies will be applied fairly and proportionately.

5.5 Reporting to External Authorities

5.5.1 KSM encourages employees to report concerns **internally** first, as the preferred channel to ensure prompt resolution and confidentiality. However, the company recognizes that there may be situations where a whistleblower feels it is appropriate to report to an **external party**, such as:

- i. Regulatory authorities (e.g., anti-corruption agency, environmental agency, labour department)
- ii. Law enforcement
- iii. A court or legal body
- iv. Professional or licensing bodies

5.5.2 The external reporting is permitted, especially in cases where:

- i. The concern involves criminal conduct or a serious breach of the law
- ii. Internal reporting was made but not addressed properly
- iii. There is a reasonable fear of retaliation or cover-up
- iv. The matter is urgent and poses immediate risk to health, safety, or the environment

5.5.3 Whistleblowers who report externally in good faith and with reasonable grounds will receive the same level of protection as those who report internally. However, the disclosure must be made responsibly — for example, it should not include deliberate false information, breach of unrelated confidential data, or violate contractual obligations unnecessarily.

5.6 Whistleblowers are **strongly encouraged** to **first use internal KSM reporting channels**, unless there is a valid reason to believe internal disclosure would be ineffective or dangerous.

5.7 Whistleblowers should **maintain confidentiality** and avoid public or social media disclosures in all cases, which may not be protected and could result in disciplinary or legal consequences.

6.0 Investigation Process

- i. **Acknowledgment** – The report is received and acknowledged within three (3) business days.
- ii. **Assessment** – The case is reviewed to determine if an investigation is needed.
- iii. **Investigation** – A formal investigation is conducted by an internal committee whose members will be kept confidential and are appointed directly by the internal board.
- iv. **Outcome & Action** – Appropriate corrective actions or legal steps are taken.
- v. **Closure & Feedback** – The whistleblower is informed of the outcome where possible.

7.0 False Reports

Malicious or false reports made in bad faith will not be tolerated and may result in disciplinary action.

8.0 Review & Compliance

This policy is reviewed at three (3) yearly intervals to ensure its effectiveness and compliance with legal and regulatory requirements. Awareness and refresher briefings are conducted every two (2) years.