

Bina Puri Holdings Bhd.

Whistle-blowing Policy

1. Objective

Bina Puri Holdings Bhd. ("BPHB"/Company) is committed to achieving and maintaining high standards with regards to behaviour at work as set out in BPHB's "Vision & Mission". In order to achieve the standards set out, all employees and stakeholders (i.e. shareholders/suppliers/ customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns. BPHB views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.

The policy and procedures is applicable to all companies within BPHB Group.

2. Definition

Whistle Blowing is a specific means by which a worker or stakeholder can report or disclose through established channels, concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place/has taken place/may take place in the future.

Only genuine concerns should be reported under Whistle Blowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

3. Reporting Procedures

a) For employees to make reports

If any employee believes reasonably and in good faith that misconduct exists in the workplace, the employee should report this immediately to the line manager/ Human Resource Manager. However, if for any reason the employee is reluctant to do so, then the employee should report the concerns to the independent directors of BPHB:-

- Tan Sri Dato' Ir. Wong Foon Meng - Chairman/Independent Non-Executive Director
- Dato' Yeow Wah Chin - Independent Non-Executive Director
- Ir. Ghazali Bin Bujang - Independent Non-Executive Director
- Mohd Najib Bin Abdul Aziz - Independent Non-Executive Director

They can lodge the report to wbpolicy@binapuri.com.my for which the above mentioned persons will have access.

b) For Stakeholders to make report

Stakeholders, who have suspected misconduct(s) are encouraged to communicate either in writing via mail or email and be addressed to the following parties:-

- Tan Sri Dato' Ir. Wong Foon Meng - Chairman/Independent Non-Executive Director
- Dato' Yeow Wah Chin - Independent Non-Executive Director
- Ir. Ghazali Bin Bujang - Independent Non-Executive Director
- Mohd Najib Bin Abdul Aziz - Independent Non-Executive Director

They can lodge the report to wbpolicy@binapuri.com.my for which the above mentioned persons will have access.

4. Action

- a) All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group (e.g. Group Internal Audit, Group Human Resource Department, Group Legal Department etc.). The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- b) Reports received anonymously will be treated as confidential.
- c) 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.
- d) Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
- e) Where possible, steps will also be implemented to prevent similar situation arising.

5. Further action

For any reason, the person making the report is not satisfied with the way his report had been dealt with; the matter can be escalated to the Chairman of Audit Committee, Dato' Yeow Wah Chin.

6. Policy Review

This Policy shall be reviewed periodically to ensure that it continues to remain relevant and appropriate.