

WHISTLEBLOWING POLICY

INTRODUCTION

Rubberex Corporation (M) Berhad and its subsidiary companies (the “Group” or “Company”) are committed to the highest standards of integrity, openness and accountability in the conduct of its business and operations as well as promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

This policy draws up the general guidelines that allows the employees of the Group and other stakeholders to report or disclose without fear of retaliation any improper conduct or wrongdoing within the Group.

SCOPE

Improper conduct or wrongdoing includes, but not limited, to the following acts and undertakings:

- Fraud (intentional or non-intentional);
- Misappropriation of assets;
- Criminal breach of trust;
- Illicit and corrupt practices;
- Questionable or improper accounting;
- Illegal or criminal offences;
- Conflicts of interests without disclosure;
- Misuse of Company’s properties or confidential information;
- Endangerment of employees’ and public’s health and safety;
- Acts or omissions which are deemed to be against the interest of the Company, laws, regulations or public policies; and
- Deliberate concealment of any of the above matters or wrongdoing.

REPORTING POLICY

Whenever possible, issues should be raised and dealt with through the normal reporting lines and procedures in the Company. However, where it is believed that the malpractice cannot be resolved through the normal reporting lines and procedures, or implicates senior levels of management within the Group and/or the employee’s own employment may be jeopardised by raising the concern, then issues may be raised through alternative channels provided by this policy.

This policy does not replace the grievance procedures and/or disciplinary policies already in place but to provide additional avenues for employees or other stakeholders to report or disclose without fear of retaliation, any improper conduct or wrongdoing committed or about to be committed.

REPORTING IN GOOD FAITH

The Company expects employees and other stakeholders to report genuine concerns without prejudice, in good faith and on reasonable grounds.

THE WHISTLEBLOWER'S PROTECTION

A whistleblower under this Policy may be accorded with the necessary protection of confidentiality, to the extent reasonably practicable.

At Rubberex, a whistleblower employee will also be protected against an adverse employment action (such as penalty, demotion, suspension or dismissal) and retaliation should he/she comes forward with the following:-

- disclosing any improper conduct or wrongdoing committed or about to be committed;
- reports what he/she believes constitutes a violation of any internal or external guidelines, rules and regulations of the Company;
- reports any fraud committed by staff, breach of the Company's Code of Conduct and Ethics, conflicts of interests or similar policy breach, if made in good faith;
- provides information or causing information to be provided in an investigation conducted in-house or externally by any regulatory agency or authority (such as the police, government agencies or ministries, Securities Commission, Bursa Malaysia Securities Berhad and/or the Malaysian Anti-Corruption Commission); and
- participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with any such report.

Any party that retaliates against someone who has reported a misconduct or wrongdoing in good faith may be subject to appropriate action, up to and including legal action, where applicable. However, protection under this Policy will not mean protection from disciplinary action (including termination of employment) arising out of false, frivolous, or baseless allegations made by a whistleblower knowingly.

WHISTLEBLOWING FRAMEWORK

The Whistleblowing procedures outline the Company's commitment to have a channel in which stakeholders are able to report instances of improper conduct or wrongdoing.

The report should be in writing, submitted via post or email and addressed to either:-

Mr. Chan Chee Kheong
Company Secretary,
c/o Tricor Corporate Services Sdn Bhd,
41 Jalan Medan Ipoh 6,
Bandar Baru Medan Ipoh,
31400 Ipoh, Perak, Malaysia.
Email: chee.kheong.chan@my.tricorglobal.com

Or Dato' Mohamed bin Hamzah
Audit Committee Chairman,
8A Jalan Watson,
30350 Ipoh, Perak, Malaysia.
Email: mohamedbinhamzah@yahoo.com

- His/Her statements are to be recorded in the Whistleblowing Form, a sample of which is enclosed.
- Reports received anonymously will be treated with confidentiality.
- An independent investigation team may be set up by the Management to investigate genuine concerns within a reasonable timeframe. Upon completion of the investigation, the findings may be submitted to the Audit Committee for their deliberation and further action.

Whistleblower Protection Act 2010

In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010 ("Act"), the Act shall prevail.

March 2018

RUBBEREX CORPORATION (M) BERHAD

Company no. 372642-U

WHISTLEBLOWING FORM

Date: _____

A. DETAILS OF SUSPECT

- (i) Name of person(s) alleged:
- (ii) Designation/Department of the person(s) alleged (if known):
- (iii) Please describe the alleged wrongdoing: _____

- (iv) Incident date and time:
- (v) Incident location:
- (vi) Please attach a separate narrative if necessary and provide any evidence or document to support to your claim.
- (vii) Please provide information of any other parties involved and/or any other information that may be relevant.

B. WITNESSES

Please provide contact details of the witnesses to the alleged incident:

Witness 1

Name:
Telephone contact:
Email contact:

Witness 2

Name:
Telephone contact:
Email contact:

C. ACTING IN GOOD FAITH

Your act of reporting the wrongdoing committed by the alleged person signifies that you have read the Company's Whistleblowing Policy and you are making the report in good faith.

D. DECLARATION (Please sign this section even if you wish to remain anonymous)

I declare that this report is made by me after due and careful inquiry, without false accusation or malicious intent.

Signature

Date:

Please provide your contact details here if you are making this report in your name:

Name:

Telephone contact:

Email contact: