



3E PRECISION SDN BHD

WHISTLEBLOWING POLICY & PROCEDURE

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The Company reserves the right to review, amend or update this Policy from time to time.

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1 POLICY STATEMENT

- 1.1 An important aspect of accountability and transparency is a mechanism to enable staff and other members of the company to voice genuine concerns in a responsible and appropriate manner.
- 1.2 3E Precision Sdn Bhd (“the Company”) is committed to promoting and maintaining high standards of transparency, accountability, ethics and integrity at the workplace.
- 1.3 The procedures contained in this Policy provide a process of managing disclosures of improper conduct that is transparent without compromising the confidentiality of persons involved.
- 1.4 This Policy is to be read together with the Company’s Employee Guidelines, Sexual Harassment Policy, Anti Bribery and Anti-Corruption Policy & Framework and other internal, statutory or regulatory reporting procedures.

2 DEFINITIONS

- 2.1 “Whistleblowing” is the disclosure of Improper Conduct based on one’s reasonable belief that any person has engaged, is engaging or preparing to engage in Improper Conduct. This applies even in circumstances where information regarding Improper Conduct is supposed to be treated as confidential.
- 2.2 “Whistleblower” is a person who discloses information of Improper Conduct in accordance with this Policy.
- 2.3 “Improper Conduct” is any conduct which if proved, constitutes a serious Disciplinary Offence or a criminal offence. Improper Conduct includes, but are not limited to, the following:
 - (a) criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
 - (b) failure to comply with legal or regulatory obligations;
 - (c) misuse of the Company’s funds or assets;
 - (d) an act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
 - (e) unsafe work practices or substantial wasting of company resources;
 - (f) abuse of power by an officer of the Company; and
 - (g) concealment of any of the above.
- 2.4 “Appointed Officer” means authorized person appointed to receive reports on Whistleblowing matters.
- 2.5 “Disciplinary Offence” means any action or omission which constitutes a breach of discipline in the Company as provided by law or the Company’s code of conduct, code of ethics, policies and/or a contract of employment, as the case may be.
- 2.6 “Detrimental Action” includes:
 - (a) action causing injury, loss and/or damage;

- (b) intimidation and/or harassment;
- (c) interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person's employment, career, profession, trade or business or the taking of disciplinary action; and
- (d) the threat to take any of the actions referred to above.

2.7 "Confidential Information" includes:

- (a) information about the identity, occupation, residential address, work address or whereabouts of:
 - (i) a Whistleblower; and
 - (ii) a person against whom a Whistleblower has made a disclosure of improper conduct;
- (b) information disclosed by a Whistleblower; and
- (c) information that, if disclosed, may cause detriment to any person.

2.8 "Investigating Officer" means the person appointed to investigate an Improper Conduct.

3 OBJECTIVES

3.1 The objectives of this Policy are as follows:

- (a) to provide employees and third parties with proper internal procedures in disclosing cases of Improper Conduct;
- (b) to manage disclosures of Improper Conduct in an appropriate and timely manner;
- (c) to provide protection to Whistleblowers from Detrimental Action that may result from the disclosure of Improper Conduct; and,
- (d) to provide fair treatment to both the Whistleblower and the alleged wrongdoer when a disclosure of Improper Conduct is made.
- (e) to set out the processes to manage the overall system and implementation of the Whistleblowing Policy owned by Risk Management Committee Group.

4 OWNERSHIP

4.1 The Risk Management Committee Group is responsible for the oversight of and is ultimately accountable for this Policy & Procedure.

4.2 For any ethical conduct incident happened, the employee and third parties may report the incident by email us to whistleblowing@3eprecision.com or;

4.3 You also can refer to authorized team members as stated as below:

- (a) David Chin (Production Manager), Contact No: +60108232320

- (b) Stella Si (Senior HR Assistant), Contact No: +60127099630
- (c) Sharon Ho (Junior HR Assistant), Contact No: +60189551218

4.3 The details on the report must be recorded by members that state in 4.2 as per below details :

- (i) Name of Reporter, you can leave as anonymous
- (ii) Date & Time of Incident ?
- (iii) What is the incident ?
- (iv) Where that the incident happen ?
- (v) Is there any witness of the incident ?
- (vi) Are there any other parties involved other than the suspect stated above?

4.4 The use and effectiveness of this Policy shall be regularly monitored and reviewed by the Committee group members.

4.5 All the Risk Management Committee Group shall be responsible for incorporating any amendments and updates into this document, obtaining the approval of the committee for those amendments and updates and distributing the same to the relevant parties.

5 SCOPE OF POLICY

This policy applies to, but is not limited to, whistleblowing about any of the following:

- (a) Conduct which is an offence or breach of the law
- (b) Alleged miscarriage of justice
- (c) Serious Health and Safety risks
- (d) The unauthorized use of company fund
- (e) Bribery
- (f) Sexual, physical or verbal abuse, or bullying or intimidation of director, employee, customer, supplier or connected person to the Group
- (g) Abuse of authority
- (h) Breach of company policies
- (i) Other unethical conducts

6 GOOD FAITH

6.1 Since an allegation of Improper Conduct may result in serious personal repercussions for the person who has allegedly committed an Improper Conduct, any person who intends to lodge any report of Improper Conduct shall ensure that the report of Improper Conduct is made in good faith.

- 6.2 Any person making an allegation of Improper Conduct must have reasonable and probable grounds before reporting such Improper Conduct and must undertake such reporting in good faith, for the best interest of the Company and not for personal gain or motivation.
- 6.3 The element of good faith shall be deemed to be lacking when:
- (a) the person does not have personal knowledge or a factual basis for the report of Improper Conduct; or
 - (b) where the person knew or reasonably should have known that the report or any of its contents are false; or
 - (c) where the report is frivolous or vexatious; or
 - (d) there are any other circumstances that indicate that the report has been made with malicious intent, ulterior motive or for personal gain.
 - (e) Any person who has not acted in good faith shall not be entitled to any protection under this Policy & Procedure.
 - (f) An Employee who makes allegations or reports that are proven to have been made without good faith may be subjected to disciplinary action (which may include termination of employment or contract)

7 REPORT

- 7.1 Disclosure of information should initially and promptly be made by the Whistle-blower to the members of Risk Management Committee Group.
- 7.2 All the reports received by any member of the committee shall be immediately notified to any members of the Board of Directors or the Managing Director, subject to relativeness of report of information.
- 7.3 In event that, if the report is about one of the members of the committee, the member who received the report may opt to not to report or share to all the committee members, but to other members of the Board of Directors.

8 PROTECTION OF CONFIDENTIAL INFORMATION

- 8.1 Reasonable steps will be taken to maintain the confidentiality of the Whistleblower's Confidential Information, particularly the identity of the Whistleblower unless:
- (a) the Whistleblower expressly agrees otherwise, and provides his agreement in writing; or
 - (b) otherwise required by law.
- 8.2 The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties, information regarding the Improper Conduct or any part thereof, including the status or outcome of an investigation into it, except
- (a) to those who are authorized under this Policy; or,

- (b) on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

8.3 The Whistleblower shall not:

- (a) contact the suspected individual to determine facts or demand restitution; and,
- (b) discuss the case, facts, suspicions, or allegations with anyone except to assist in the investigation.

9 RECORD SAFEKEEPING

9.1 All records of disclosures made shall be managed in compliance with the provisions of the Personal Data Protection Act 2010 and other applicable laws.

10 PROTECTION OF THE WHISTLEBLOWER

10.1 Upon making a disclosure in good faith, based on reasonable grounds and in accordance with and pursuant to this Policy:

- (a) The Whistleblower shall be protected from any Detrimental Action within the Company as a direct consequence of the disclosure; and
- (b) The Whistleblower's identity and such other Confidential Information of the Whistleblower shall not be disclosed save in accordance with Clause 8.1.

10.2 The protection against Detrimental Action is extended to any person related to or associated with the Whistleblower.

10.3 The identity and personal information of the Whistleblower as well as the person implicated in the disclosure may be revealed to persons involved in investigations or any other required processes so far as is necessary to assist investigations and/or as required for a due inquiry process to be made. A Whistleblower may also be required to appear as a witness for the Company in the due inquiry process.

10.4 A Whistleblower is obliged to lodge a complaint to the Company of any Detrimental Action committed against the Whistleblower or any person related to or associated with the Whistleblower, by any personnel of the Company. The Detrimental Action Complaint Form is attached in Appendix B.

10.5 A Whistleblower or any person associated with him who fears or has suffered Detrimental Action may request to the Company in writing, for relocation of his place of employment. The Company shall, as far as is practicable, make arrangements for the relocation if there is a danger or likelihood of Detrimental Action and the only practical means of removing or substantially removing the danger of the effect of Detrimental Action is by way of relocation.

10.6 The Whistleblower protection conferred under this Policy is not limited or affected notwithstanding that the disclosure of the Improper Conduct does not result in any disciplinary action of the person against whom the disclosure was made.

- 10.7 This Policy does not limit the protection conferred by any other written law to any person in relation to information given in respect of the commission of an offence.
- 10.8 The Whistleblower protection conferred under this Policy does not apply where a disclosure was made in a manner inconsistent with or not in compliance with the provisions of this Policy. Notwithstanding the above, the Whistleblower will still be conferred protection save as so far as afforded by the Whistleblower Protection Act 2010 or any other written law.

11 REVOCATION OF WHISTLEBLOWER PROTECTION

- 11.1 The Company reserves the right to revoke the Whistleblower protection provided pursuant to this Policy if it is of the opinion, based on an investigation or in the course of an investigation that:
- (a) the Whistleblower himself has participated in the Improper Conduct disclosed, except in instances where:
 - (i) the participation was under duress; or
 - (ii) in the view of the Company, the participation could be justified under the circumstances.
 - (b) the Whistleblower willfully made in his disclosure of Improper Conduct a material statement which he knows or believes to be false or did not believe to be true;
 - (c) the disclosure is made solely with the motive of avoiding dismissal or other disciplinary action;
 - (d) the Whistleblower has made disclosures of Improper Conduct to other parties inside or outside the Company and not only through the persons mentioned in Section 8 this Policy.
 - (e) the disclosure of Improper Conduct is frivolous and/or vexatious; and/or
 - (f) the Whistleblower, in the course of making the disclosure or providing further information, breaches the provisions of this Policy and/or commits an offence under the Whistleblower Protection Act 2010.
- 11.2 If the Whistleblower protection has been revoked, the Company shall give a written notice to the Whistleblower of the revocation together with reasons for the same.

The Policy shall come into effect on 17 March 2023.

Signature : _____

Name : EASON KEE AH TER

Designation : PRODUCTION DIRECTOR

Date : 17 MARCH 2023

Appendix A

WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

REPORTER'S CONTACT INFORMATION <i>(This section may be left blank if the reporter wish to remain anonymous)</i>	
NAME *	
DESIGNATION	
DEPARTMENT/AGENCY	
CONTACT NUMBER	
E-MAIL ADDRESS *	
SUSPECT'S INFORMATION	
NAME *	
DESIGNATION	
DEPARTMENT/AGENCY *	
CONTACT NUMBER	
E-MAIL ADDRESS	
WITNESSES'S INFORMATION (if any)	
NAME	
DESIGNATION	
DEPARTMENT/AGENCY	
CONTACT NUMBER	
E-MAIL ADDRESS	
COMPLAINT: Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.	
1. What misconduct / improper activity occurred?*	
2. Who committed the misconduct / improper activity?*	
3. When did it happen and when did you notice it?*	
4. Where did it happen?*	

5. Is there any evidence that you could provide us?
6. Are there any other parties involved other than the suspect stated above?
7. Do you have any other details or information which would assist us in the investigation?
8. Any other comments?

**mandatory fill*

SIGNATURE		SIGNATURE	
REPORT BY		RECIEVED REPORT BY	
DATE		DATE	

