



SUPREME GROUP  
WHISTLEBLOWER POLICY

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**1. PURPOSE**

The Whistleblowing Policy is intended to directly support the Group's Core Values, Code of Ethics and Governance requirement. SCR Group places high value on the level of trust and integrity expected of its employees within its Group of Companies ('Group'). It is also intended to encourage and enable employees and others to raise concerns within the Group prior to seeking resolution outside the Company. In line with this, SCR Group of Companies has adopted a Whistleblowing Policy that outlines the Group's commitment to ensure that employees and other stakeholders are able to raise concerns regarding any illegal conduct or malpractice at the earliest opportunity without being subject to victimization, harassment or discriminatory treatment, and to have such concerns properly investigated. This policy sets out the mechanism and framework by which employees, contractors, consultants and any other individuals or organization who have dealings with the Group can confidently voice concerns / complaints in a responsible manner without fear of discriminatory treatment.

**2. SCOPE**

This Whistleblowing Policy applies to the Group and all its subsidiary companies. All employees (whether permanent, contract, part-time or casual), Directors, Shareholders, Consultants, Vendors, Contractors, external agencies or any parties with a business relationship with the Group or its subsidiaries are encouraged to disclose any wrongdoing that may adversely impact the Group.

**3. DEFINITIONS**

- a) Whistleblowing – This occurs when an employee / other stakeholder raises a genuine concern about a dangerous or illegal activity or improper conduct that he / she is aware of through his / her work / dealing.
- b) Whistleblower – The employee / other stakeholder who discloses or reports the wrongdoing.

**4. POLICY**

- a) The Group encourages the employees / other stakeholders to make any disclosures openly and honestly and that concerns / complaints raised will be treated fairly and properly.
- b) All disclosures made under this Policy will be dealt with in a confidential manner. Disclosures received under anonymity will not be entertained to prevent invalid malicious reporting, poison letters, exploitation and victimization.
- c) The Whistleblower is required to identify himself / herself and provide contact information in his / her report. This will facilitate the investigator to obtain further information, if required and communicate on results of investigation to the Whistleblower.



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**5. IMPROPER CONDUCT**

The following shall constitute “Improper Conduct” under this Policy:

- Incidents of fraud, corruption or bribery;
- Conduct or activity which breaches any law or regulatory obligation;
- Breach of the Group’s policies, practices, procedures or other rules of conduct;
- Improprieties in matters of financial reporting; and
- Situation which pose a danger to health, safety or any individual or significant danger to the environment

(Other improper conducts as provided in the **following Appendix 1**)

**6. COMMUNICATION CHANNEL**

a) Disclosure of information should initially and promptly be made by the Whistleblower to one or more of the following persons within the Group:

- Dato Richard Wee Liang Chiat (Group Managing Director)
- Ibrahim Baki (Group Chairman)

b) Report or disclosure under this Policy can be made through e-mail [[whistleblower@supremegroup.my](mailto:whistleblower@supremegroup.my)] or mail (using the attached form as per Appendix II addressed to the above persons. The detail is as follows:

Mailing Address: Supreme Consolidated Resources Sdn Bhd,  
Lot 919, Block 7, Muara Tebas Land District,  
Demak Laut Industrial Park, Sejingkat,  
93050, Kuching, Sarawak, Malaysia.

c) Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

**7. REQUIRED EVIDENCE**

a) The Whistleblower should be able to provide the disclosure in writing, information regarding the type of activity or conduct, identity of the person(s) suspected as being involved, when it occurred and who was affected.

b) The Whistleblower must have first-hand knowledge or information of the facts, i.e. information obtained from third party or „hearsay“ will not be entertained. However, the Whistleblower should not be discouraged from making a report because they are unsure whether there is sufficient evidence to support their allegations.



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**8. CONFIDENTIALITY & PROTECTION**

- a) A Whistleblower must identify himself / herself when submitting a complaint / disclosure. Upon making the disclosure in good faith:
- The Whistleblower will be protected from any reprisal within the Group or its subsidiaries as a direct consequence of the disclosure. („Reprisal“ means disciplinary measures, demotion, suspension or termination of employment or service);
  - The Whistleblower’s identity shall be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against the Group;
  - The identity and personal information of the Whistleblower and the alleged wrongdoer may be revealed to persons involved in the investigations or any other process.
- b) Protection under 8(a) above will be accorded by the Group only when the Whistleblower satisfies all the following conditions:
- The disclosure is done in good faith;
  - The whistleblower is aware that the information and any allegations disclosed are true;
  - The whistleblower has not communicated the disclosure to any other party not related to the disclosure;
  - The disclosure made is not for personal gain or interest.
- c) The Group views seriously any false, malicious or defamatory allegation. This can be considered as gross misconduct where appropriate disciplinary action may be taken by the Group.
- d) Suppliers/ Vendors of the Group and members of the public who become a Whistleblower will also be protected by the Group as to his / her / its identity subject to satisfying all conditions in 8(b) above.
- e) Employee and industrial relations related issues and human resources related issues are excluded from the operation of this Policy because they are other established mechanisms to raise such complaints.



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**9. PROCEDURES**

- a) All complaints / disclosures received would be placed before a Whistleblowing Committee for its action.
- b) The Whistleblower Committee shall comprise of the following members:
  - Group Chairman
  - Independent Non-Executive Directors
- c) The Committee shall have the authority to:
  - determine the legitimacy of the disclosure;
  - direct further action; and
  - determine who should conduct the investigation i.e. engage external expertise, management or Audit Committee.
- d) If any of the Committee members is the suspect being involved in the improper conduct, he / she will automatically abstain from attending the meeting.
- e) The assigned investigator must take all reasonable steps to ensure that investigations regarding the disclosure are fair and unbiased.
- f) The assigned investigator will keep detailed records of all evidence gathered, interviews conducted and all records received which affect the outcome of the investigation.

**10. REPORTING**

- a) Upon conclusion of the investigation, the assigned investigator will present the outcome of the investigation to the Board of Director.

**11. ACTION SUBSEQUENT TO REPORT**

- a) If the Audit Committee is satisfied with the outcome of the investigation, it will communicate to management to proceed with action based on established policy and procedures for the necessary disciplinary action to be taken immediately. Instituting the disciplinary action will be the responsibility of Group Finance Manager. If the case is involving members of the Board, it will be deliberated by the BOARD OF DIRECTORS OF SCR GROUP.
- b) Key Management must also take into account recommendations contain in the investigation report to prevent the conduct from continuing or occurring in the future. Actions to be taken may also be directed to remedy any harm or loss arising from the conduct.



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**12. REVIEW OF THIS POLICY**

The Board of Directors or Audit Committee can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulation and / or accommodate organizational changes within the Group.

However, the modification made shall be effective after the same is circulated to employees in writing or electronically.



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**APPENDIX I**

**List of Complaints under Whistleblowing Policy**

The list of complaints / concerns includes, but is not limited to;

- Corruption or bribery
- Breaching of legal obligation
- Misuse of Group information
- Any dishonest or fraudulent act
- Any act of conflict of interest with suppliers, vendors or contractors
- Forgery or alteration of any document or account belonging to the Group
- Forgery or alteration of a cheque, bank draft or any other financial document
- Misappropriation or theft of funds, supplies or other assets
- Providing or accepting gifts or material value to/from customers, contractors, vendors or other persons doing or attempting to do business with the Group or its Group of Companies that are intended to influence a business decision or selection process
- Destruction, removal or inappropriate use of the Group's records, furniture, fixtures and equipment
- Falsifying payroll records or overtime claims
- Falsifying travel and entertainment expenses and/or utilizing Group funds to pay for personal expenses
- Fictitious reporting or receipts, delivery orders, etc from suppliers or shipment to customers
- Misappropriation of Group-owned computer hardware, software, data, etc
- Acceptance of fictitious quotations from suppliers, vendors or contractors in favouring for a particular entity
- Inventory or asset theft
- Any other detrimental wrongdoing which nature of the wrongdoing is subject to absolute discretion of the Committee



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APPENDIX II

**WHISTLEBLOWING FORM**

WHISTLEBLOWING REPORT		
To:		
Incident Date & Time	Date:	Time:
Incident Location		
Name of alleged person/Dept		
Description/ Circumstances of alleged incident (Please use attachment if necessary)	<ul style="list-style-type: none"><li>• <i>What, who ,when, where, how, witness</i></li><li>• <i>Please provide evidence to support the claim</i></li></ul>	
Signature : _____		
Name : _____		
Department : _____		
Telephone No : _____		
Date : _____		

*Note: It is necessary to provide your name and contact number so that we can contact you for additional information of the reported concern.*