



**SINO HUA-AN INTERNATIONAL BERHAD**  
**(732227-T)**

# WHISTLE BLOWING POLICY

## **Policy Statement**

SINO HUA-AN is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Recognizing the abovementioned values, SINO HUA-AN provides avenue for all employees of SINO HUA-AN and members of the public to disclose any improper conduct within SINO HUA-AN.

## **Objective of the Policy**

This policy is to provide an avenue for all employees of SINO HUA-AN and members of the public to disclose any improper conduct in accordance with procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

## **Scope of the Policy**

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- i. Fraud;
- ii. Bribery;
- iii. Abuse of Power;
- iv. Conflict of Interest;
- v. Theft or embezzlement;
- vi. Misuse of Company's Property;
- vii. Non Compliance with Procedure

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act or misconduct under SINO HUA-AN's Code of Ethics and Business Conduct or any criminal offence under relevant legislations in force.

This policy is to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company.

### **Applicability of the Policy**

Subject to the requirement of applicable local jurisdiction, this policy applies to all employees of SINO HUA-AN and its subsidiaries. This policy also applies to members of the public, where relevant.

### **Procedure in Making a Disclosure**

All disclosures are to be channeled in accordance with the procedures as provided under this policy.

### **Protection to Whistleblower**

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within SINO HUA-AN, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the acts and the rules and procedures involved.

### **Anonymous Whistleblower**

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However the Company reserves its right to investigate into any anonymous disclosure.

### **Notification**

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

*\* SINO HUA-AN reserves the right to amend this policy from time to time.*