



## CARLO RINO GROUP BERHAD

Registration No. 200901037127 (880257-A)

### WHISTLEBLOWING POLICY

**Effective Date: 1 June 2020**  
**Revision Date: 3 January 2024**

#### 1. INTRODUCTION

Carlo Rino Group Berhad (“CRG” or “the Company”) and its subsidiaries (“the Group” or “CR Group”) is committed to promote and maintaining high standards of transparency, accountability, ethics and integrity at the workplace in line with its corporate values. An accountable and transparent workplace provides a mechanism for relevant parties to raise their concerns in a responsible and appropriate manner.

#### 2. OBJECTIVES

The intended objectives of this Whistleblowing Policy (the “Policy”) are:

- (i) To provide avenues for personnel of the Group and members of public to raise genuine concerns or allegation through the appropriate channels upon discovery of possible misconduct.
- (ii) To ensure the protection to individual who reports the concern or allegation in good faith in accordance with this Policy.
- (iii) To encourage and develop a culture of openness, accountability and integrity.
- (iv) To enable timely reporting of alleged misconduct, irregularities or malpractices.

#### 3. SCOPE OF THE POLICY

This Policy applies to the Group and all its directors and employees working at all levels and grades, shareholders and other stakeholders of the Group, which may include but not limited to customers, business partners, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials, who have become aware of or reasonably suspect that any personnel of the Group has engaged, is engaging or preparing to engage in any improper conducts.

They are encouraged to report or disclose through established channels, concerns/allegation on all forms of misconduct, irregularities or malpractices related to CR Group which include but not limited to the followings:-

- (i) criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
- (ii) failure to comply with applicable laws, rules, regulations or regulatory obligations;
- (iii) misuse of the Group’s funds or assets;
- (iv) 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;
- (v) conflict of interest;
- (vi) harassment, abuse or misrepresentation of power and authority;
- (vii) breach of Group’s policies, code of conduct, code of ethics or other practices; and
- (viii) concealment of any of the misconduct, irregularities or malpractices related to CR Group

The above list is not exhaustive and there will be instances where whistleblower(s) would need to exercise judgement.



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#### 4. ACTING IN GOOD FAITH

The Group expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it, are sustainably true and not acting for personal gain. Any anonymous whistleblower will not be entertained. However, the Group reserves its right to investigate into any anonymous disclosure. Any whistleblowing which is found to be frivolous or vexatious will be disregarded and parties responsible may be subject to appropriate action to be decided by the Board of Directors of CRG.

#### 5. CONFIDENTIALITY

The identity of the whistleblower will be kept confidential (to the extent reasonably practicable). Consent of whistleblower will be sought should there be a need to disclose identity for investigation purposes.

#### 6. PROTECTION TO WHISTLEBLOWERS

The Group assures the whistleblower, who raises issues of concern in good faith, based on reasonable grounds and in accordance with this Policy, that he/she will be protected from interference with his/her lawful employment or livelihood, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to his/her employment, career, profession, trade or business or the taking of disciplinary action as a result of his/her reporting, provided the report is made in good faith and without malice. Any party that retaliates, including harassment and victimization, against whistleblower who has reported allegations in good faith may be subject to appropriate action to be decided by the Board of Directors of CRG..

#### 7. REVOCATION OF PROTECTION TO WHISTLEBLOWERS

The protection stated in above shall be revoked by the Group if:

- (i) The whistleblower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud and/or abuse;
- (ii) The whistleblower made his/her disclosure without good faith;
- (iii) The disclosure was frivolous or vexatious, or
- (iv) The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistleblower himself/herself.

An employee making allegations or reports that prove to have been made without good faith will be subject to disciplinary action.

#### 8. ACTION

All reports will be investigated promptly by the person receiving the report or disclosure. If required, assistance from other resources within the Group can be sought. Upon completion of investigation, appropriate course of action will be recommended to the Board of Directors of the Company ("Board") for their deliberation. Decision taken by the Board will be implemented immediately. Where possible, steps will also be implemented to prevent similar situation arising.



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#### 9. WHISTLEBLOWING REQUIREMENTS

The reports should be submitted together with the following information:-

- (ii) Details of the whistleblower
- (iii) Type of improper activity/conduct
- (iv) Details of suspected personnel involved
- (v) Details of incident (including date, time and location of incident)
- (vi) Any supporting/documentary evidence

#### 10. WHISTLEBLOWING CHANNEL

The established channels for whistleblowing reporting are as follows:

- a) Any concern should be raised with the Managing Director Office (“MDO”) via electronic email to [mdo@carlorino.net](mailto:mdo@carlorino.net) or letter by marking “Private and Confidential” and deliver to the following address:- .

Carlo Rino Group Berhad  
Lot No. L2-05, 2nd Floor, Ikon Connaught,  
No.160, Jalan Cerdas, Taman Connaught,  
56000 Kuala Lumpur, Malaysia  
Telephone: 03-91089600

- b) If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Chairman of the Board via electronic email to [whistleblowing@carlorino.net](mailto:whistleblowing@carlorino.net) or letter by marking “Private and Confidential” and deliver to the address above.

#### 11. REVERTING TO WHISTLEBLOWER

The whistleblower will be informed on the outcome of the investigation, however, the Group reserves the right not to inform the whistleblower of the precise action plan of the investigation as this may infringe a duty of confidentiality owed to someone else.

#### 12. REVIEW OF THE POLICY

This Policy will be reviewed from time to time to ensure its effectiveness and consistency with the governing legislation and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.