

HARN LEN CORPORATION BHD (502606-H)

Whistleblowing Policy

1. POLICY STATEMENT

Harn Len Corporation Bhd and its subsidiary companies (the Group) are committed to achieving and maintaining high standards with regards to ethical and legal business conduct.

The Board and the Management of the Group must maintain a workplace that practises good corporate governance and upholds integrity in all its operational activities and business dealings. All employees and stakeholders (i.e. shareholders/suppliers/customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts of failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.

2. OBJECTIVES

The objectives of this policy is

- i) to provide/facilitate a mechanism for genuine whistleblower to report suspected or actual wrongdoing in the conduct of the Group's business ,
- ii) to provide protection to genuine whistleblower acting in good faith ; and
- iii) to provide for the reported matters to be investigated and dealt with.

3. SCOPE OF POLICY

The primary purpose of this policy is to govern the reporting and handling of malpractice or impropriety at the Group. Malpractice or impropriety shall mean, but not limited to, reporting of fraudulent financial information, actual or suspected fraud, misappropriation of monies, misrepresentation, violation of laws and regulation, endangerment of health and safety, criminal offence, improper conduct or unethical behaviour.

4. REPORTING IN GOOD FAITH

Only genuine concerns should be reported under Whistleblowing Policy . This reports should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as gross misconduct and if proven may lead to dismissal.

5. PROTECTION

The Group provides assurance to the genuine whistleblower that he/she would be protected from retaliation or reprisal from his/her reporting superior or manager. The Group also assures that no disciplinary action will be taken against the genuine whistleblower on condition that the information provided is accurate, factual and there is no element of malicious intent.

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6. CONFIDENTIALITY

All complaints reported to the Group are treated in strict confidence. Information will only be disclosed on need- to-know basis and with written permission from the Audit Committee of the Board. The identity of the whistleblower will not be revealed unless it is required by law.

7. REPORTING PROCEDURES

Any concern should be raised with immediate superior/manager. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to Managing Director, Mr Low Quek Kiong and/or the Audit Committee Chairman, Mr Loh Wann Yuan :

Mr Low Quek Kiong Group Managing Director Harn Len Corporation Bhd 6 th Floor, Johor Tower, 15 Jalan Gereja, 80100 Johor Bahru	Mr Loh Wann Yuan (email : wannyuanloh@gmail.com) Audit Committee Chairman Harn Len Corporation Bhd 6 th Floor, Johor Tower, 15 Jalan Gereja, 80100 Johor Bahru
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- i) All reports will be investigated promptly by the person receiving the report.
- ii) The whistleblower shall be informed of the outcome of the investigation.
- iii) All investigations shall be tabled to the Audit Committee of the Board that has the authority to ensure effective implementation of the whistleblowing policy. The Audit Committee shall update the Board of Directors on reports that require their attention and approval .

This WhistleBlowing Policy was approved at the Board Meeting on 22 February, 2017.