

PECCA GROUP BERHAD
(Company No. 909531-D)

WHISTLE-BLOWER POLICY

1. PURPOSE

This policy is intended for Pecca Group Berhad (“Pecca” or the “Company”) and all subsidiary companies within the Pecca Group (the “Group”).

All employees of the Group play an important part in maintaining the highest level of corporate ethics within the Group and have a professional responsibility to disclose any known malpractices or wrongdoings (hereon referred to as “Concerns”).

2. SAFEGUARDS

A person or entity making a protected disclosure is commonly referred to as a “Whistle-blower”. Whistle-blowers provide initial information related to a reasonable belief that an improper activity has occurred.

Whistle-blowers are protected against being dismissed or penalised by the Group, and Pecca will consider mitigating circumstances if the Whistle-blower himself/herself is involved in the activity that he/she reports.

In order for the Whistle-blower to be protected under this policy, the disclosure must at least have details of person(s) involved, nature of allegation, when and where the incident took place as well as supporting evidence, if any.

A Whistle-blower’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

3. HARASSMENT OR VICTIMISATION

Harassment or victimisation for reporting concerns under this Policy will not be tolerated.

Complete protection will be given to Whistle-blower against any unfair practice not limited to retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or including any direct or indirect use of authority to obstruct the Whistle-blower’s rights to continue to perform his/her duties including making further disclosure.

4. CONFIDENTIALITY

Every effort will be made to treat the Whistle-blower’s identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the Whistle-blower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by a court of law. The Group’s assurance of confidentiality can only be completely effective if the Whistle-blower likewise maintains confidentiality.

5. ANONYMOUS ALLEGATIONS

This Policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the

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information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:-

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

6. PROCEDURES

6.1 Process for disclosure

I) Impropriety

This policy covers:

- improprieties or irregularities (including financial and operational);
- suspected fraud or criminal offences;
- breach of confidentiality;
- miscarriage of justice;
- corruption or bribery;
- endangerment of an individual's health and safety; and
- failure to comply with legal or regulatory requirements.

II) Reporting

Managers, officers and employees in supervisory roles shall report to the reporting person(s) as stated below on any allegations of suspected improper activities or employment-related concerns.

Improper activities disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

- 1.1 Chairman of Audit and Risk Management Committee ("ARMC")
Address: No. 1, Jalan Perindustrian Desa Aman 1A
Industri Desa Aman, Kepong,
52200 Kuala Lumpur, Malaysia
E-mail: joryleong@inyk.com

Employment-related concerns can be reported to:

- 1.2 Managing Director ("MD") and/or the Executive Director ("ED")
Address: No. 1, Jalan Perindustrian Desa Aman 1A
Industri Desa Aman, Kepong,
52200 Kuala Lumpur, Malaysia
E-mail (MD): kelvinteoh@peccaleather.com
E-mail (ED): michaeltan@peccaleather.com

Disclosures can be verbal or in writing and forwarded in a sealed envelope to the abovementioned contact person(s) labelling with a legend such as *"To be opened by the Chairman of ARMC, MD or ED only"*.

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III) Handling of a reported allegation

The action taken by the Group in response to a report of Concern under this policy will depend on the nature of the concern. The Chairman of ARMC, MD or ED shall receive information on each report of Concern and follow-up information on actions taken.

6.2 Investigator

The Internal Auditor shall be the named Investigator unless the Chairman of ARMC assigns/appoints another Investigator. Investigators must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of ARMC.

6.3 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

If an investigation leads to the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group's Code of Ethics or Conduct, the results of the investigation shall be reported to the MD or the ED in accordance with the applicable procedures for company conduct and the administration of discipline. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

7. POLICY MATTERS

This Policy shall be published at the Company's website and made available to all employees.

8. MONITORING AND PERIODIC REVIEW OF POLICY

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group and, if necessary, implement changes subject to the approval of the Board of Directors.

This policy will be reviewed periodically to assess its effectiveness.

(This Policy was approved and adopted by the Board on 24 May 2018)
