

Whistleblowing Policy

1. Purpose

Sand Nisko Capital Berhad (“**SNC**” or the “**Company**”) is committed to nurturing and maintaining a culture of openness, integrity and accountability. Directors and employees are expected to behave in line with such culture in the course of their duties.

To support our commitment towards this objective, SNC has established a Whistleblowing Policy to allow peer-monitoring, and if necessary, to provide an avenue for individuals, whether a Company employee or otherwise (the “**Reporting Individual**”), to escalate concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements to the appropriate parties.

SNC’s adoption of this system is designed to encourage personnel and concerned parties to raise concerns internally, without fear of reprisal or victimization, in a responsible and effective manner, for timely internal intervention and crisis management, in contrast to overlooking a problem or raising the alarm externally before the Company has had a chance to respond to the issue.

2. Policy

The Whistleblowing Policy is designed to enable directors, employees or external parties to raise genuine concerns over issues of public interest.

Matters which may be addressed under the Policy include, but are not limited to:

- a) Breach of legal or regulatory requirements
- b) Criminal offences, breach of civil law and miscarriage of justice
- c) Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters
- d) Endangerment of the health and safety of an individual
- e) Damage caused to the environment
- f) Violation of rules of conducts applicable within Gadang
- g) Improper conduct or unethical behavior likely to prejudice the standing of Gadang
- h) Deliberate concealment of any of the above

Reports made under the Whistleblowing Policy should be made in good faith, with reasonable belief that the facts reported are true and accurate. This Policy must not be used as an avenue to address personal grievances, which should be escalated to the appropriate superior, Head of Department or the Human Resources Department. Malicious and false allegations will be taken seriously and treated as a gross misconduct (where the Reporting Individual is an employee) and if proven, may lead to dismissal. In such cases, the Company will not prevent any legal recourses taken by the person against whom the malicious report was made.

3. Whistleblowing Procedure

All reports under the Policy are to be made in writing to the Group Chairman, or if the concern involves the Group Chairman, reports are to be directed to the Chairman of the Board Audit Committee. Details as follows:

Group Chairman –
Dato' Seri Dr Sow Chin Chuan
Email: dps3111@gmail.com
Address: PBR 2, Lot 4, 9556,
Kawasan Perindustrian Bukit Rambai
75250 Melaka
Attention: Group Chairman

Chairman of Board Audit Committee –
Mr. Kong June Hon
Email: jeremykong@jkoassociates.com.my
Address: PBR 2, Lot 4, 9556,
Kawasan Perindustrian Bukit Rambai
75250 Melaka
Attention: Chairman of Board Audit Committee

4. Investigating Procedure

Upon receipt of a report, the Group Chairman of Board Audit Committee will send a receipt acknowledgement to the Reporting Individual, outlining their response to the matter and whether further investigations will take place.

Both the Group Chairman of Board Audit Committee has the right to refer the complaint back to management if he/she feels that the management without any conflict of interest can more appropriately investigate the complaint.

The format and the length of an investigation will vary depending upon the nature and particular circumstances of each complaint made. The matters raised may:-

- a) be investigated internally;
- b) be referred to the Police;
- c) be referred to the External Auditor; and/or
- d) form the subject of an independent inquiry.

If the matter is likely to involve an extended investigation, an Investigation Officer will be appointed internally to take charge and keep track of the case.

5. Protection and Confidentiality

The Company will take strict measures to maintain the confidentiality of all disclosures made under the Policy. SNC will take the necessary measures to protect the Reporting Individual from any form of intimidation, reprisal, retaliation or adverse reaction organizationally as a consequence of reporting a legitimate concern under the Policy, including to keep their identity anonymous.

Where the Company is legally obligated to reveal the identity of the Reporting Individual, e.g., where an investigation leads to legal proceedings being initiated, the Company will take all reasonable steps to ensure that the Reporting Individual suffers no detriment. Harassment or victimization of a genuine whistle blower will not be tolerated.