



SMHB Sdn. Bhd.  
SMHB Engineering Sdn. Bhd.  
SMHB Environmental Sdn. Bhd.

## WHISTLE- BLOWER POLICY

This Whistle-Blower Policy (“this Policy”) is adopted by the SMHB Group of companies (collectively referred to as “the Company”).

The Company is committed to conducting business transparently, honestly and with integrity, and in accordance with applicable anti-bribery and anti-corruption laws.

As part of good corporate governance, the Company has set out the avenues for any known malpractices, wrongdoings or improper activities (hereon referred to as “Concerns”) to be objectively investigated and addressed, as set out in this Policy. A person or entity (hereon referred to as a “Whistle-blower”) may disclose with reasonable belief that a Concern has occurred.

This Policy is to be read in conjunction with the Company’s

- Policies and Core Values
- Gift, Hospitality & Donations Policy;
- Code of Conduct; and
- Applicable internal processes and procedures of the Group.

This Policy applies to all directors and employees (permanent, contract, probationary and temporary) of the Company, as well as external parties.

### Safeguards

A Whistle-Blower who makes a disclosure of a Concern that has occurred, shall be protected by the Company from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

The Company will consider mitigating circumstances if the Whistle-blower himself/herself is involved in the activity that he/she reports. 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.

### Confidentiality

Every effort will be made to treat the Whistle-blower’s identity with appropriate regard for confidentiality. The Company 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, except in the event of an overriding legal obligation to breach confidentiality.

### Disclosure of a Concern

Whistle-blowers shall disclose a Concern to the person stated below.

The Chairman of Integrity Committee

Email: [whistleblowing@smhb.com](mailto:whistleblowing@smhb.com)

Address: 38, Jalan 1/76D Desa Pandan, 55100 Kuala Lumpur

Disclosures shall be in written form using SMHB’s Whistle- Blowing Form, and attentioned to “The Chairman of Integrity Committee”.

### **Process of handling disclosure of a Concern**

The Chairman of the Integrity Committee (IC), upon receiving a disclosure of Concern shall initiate the process for handling the disclosure which encompasses the following steps:

- **Inquiries** to determine the validity of the disclosure and whether an investigation is appropriate, and the form that it should take.
- **Investigation** if this is deemed necessary following the initial inquiries.
- **Conclusion** from the investigation which may involve: disciplinary action or dismissal if the misconduct is in violation of the Company's Code of Conduct; or a report to the police or other appropriate law enforcement agency if a crime has been committed.

This Policy takes effect on 1 May 2021.