



PELANGI PUBLISHING GROUP BHD

Whistleblowing Policy

1. Purpose

This Whistleblowing Policy is intended to provide a framework to promote responsible and secure whistleblowing without fear of adverse consequences. In line with that commitment the Company expects employees and outside parties, such as suppliers, customers, contractors and other stakeholders to come forward and voice those concerns.

The intention of this whistleblowing policy is intended to encourage and enable employees and outside parties to raise serious concerns within the Company rather than overlooking a problem or “blowing the whistle” outside. Thus, the Policy allows for reporting employees or outside parties without fear of reprisal, discrimination or adverse consequences and also permits the Company to address such reports by taking appropriate action, including, but not limited to, disciplining or terminating the employment of those responsible.

2. Scope

This procedure is applicable to Pelangi Publishing Group Bhd. and its subsidiary companies (collectively the “Company”).

3. Definition

Audit Committee (AC)	Means the board committee established by the Board of Directors under Articles 57 and 76A, herein to which the Board of Directors’ duties in relation to internal audit functions are delegated.
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Stakeholder	A person, group or organization that has interest or concern in the Group.
Whistleblower (WB)	The stakeholder (including employees) disclosing or reporting the misconduct cases

4. Reference

4.1 Whistleblower Protection Act 2010

4.2 Composition and Terms of Reference of Audit Committee

5. Misconduct Cases

Examples of misconduct cases shall include, but not limited to, fraud, conflict of interest, bribery, corruption, abuse of authority, insider trading, misappropriation of company assets, improprieties in matters of financial reporting, etc. Any misconduct cases raised will be reviewed by Audit Committee (AC) and will either be proceeded according to Section 6 of this procedure or channeled to the Management of the Group for consideration.

Whistleblowers are encouraged to obtain first-hand knowledge or information of the alleged misconduct rather than basing on hearsay. Disclosures which are not done in good faith and with malicious intent may result in appropriate disciplinary actions taken against the whistleblower.

6. Duties and Responsibilities of Audit Committee, Board of Directors and The Management

- 6.1 One of the important functions, among others, of the Audit Committee (AC) is to ensure good internal control systems.
- 6.2 Any of the Company Secretary or Internal Auditor who receives a complaint shall call for a meeting to discuss on the issue arisen and decide whether it is a significant or insignificant issue. The meeting will be minuted by the Group's Company Secretary.
- 6.3 All issues will be summarised and brought for further discussion at the AC meeting. The AC will, at its full discretion, evaluate and finalise the segregation of significant and insignificant issues. Subsequently, the AC will decide on the appointment of appropriate party (ies) to carry out the necessary investigations.
- 6.4 Insignificant issues will be highlighted to the Management of the Group for review, followed by corrective actions if deemed necessary.
- 6.5 Investigation results/findings by the appointed party (ies) will be brought to the Board. Decision on proper action will be made by the Board in order to safeguard the stakeholders' interests.

6.6 Any AC, Board and Management who is a suspect implicated in the misconduct case shall automatically abstain from attending any of the meetings and shall not participate in nor influence any part of the whole process.

7. Reporting Mechanism

7.1 Reporting Steps for Whistleblowers

7.1.1 Contacts of the report submission are as follows:

No	Designation	Email
1	Company Secretary	whistleblowing@pelangibooks.com
2	Internal Auditor	whistleblowing@pelangibooks.com

7.1.2 The following information, which will be kept confidential, are required to be provided by the whistleblower to lodge a complaint:

- a) legal name of the whistleblower
- b) contact number of the whistleblower
- c) the whistleblower's relationship with the company
- d) person(s)/position(s) relevant to the complaint
- e) description of complaint
- f) supporting evidence, if available

7.1.4 A whistleblower who wishes to withdraw his/her disclosure shall do so in writing to Company Secretary or Internal Auditor while providing reason(s) for the withdrawal. Nevertheless, the Company reserves the right to continue with investigations relevant to the disclosure.

7.2 Reporting to the Board

7.2.1 It is the responsibility of the Company Secretary to prepare a log which documents all complaints received by the Internal Auditor. A summary of complaints will be presented for the Board's review during the regular quarterly meetings.

7.3 Reporting to the Regulator

7.3.1 When there are cases that relate to any laws, rules or regulations which require necessary reporting to the particular agency or regulatory body, it is the Management's responsibility to make the report.

7.3.2 Where the AC is of the view that a matter reported by it to the Board of the Group has not been satisfactorily resolved resulting in a breach of the Main Market Listing Requirements, the AC must promptly report such matter to the Bursa Malaysia Securities Berhad.

8 Notification

Upon completion of the whistleblowing process, the whistleblower will be notified by the Company Secretary or Internal Auditor on the outcome of his/her disclosure.

9 Whistleblower Protection

- 9.1.2 Protection is conferred on whistleblowers in accordance with the Whistleblower Protection Act 2010 (the Act).
- 9.1.3 All other parties involved in the handling of a whistleblowing case is strictly bound by the Act.
- 9.1.4 All records will be kept confidential by the Company Secretary (*per 7.2.1*) and no one shall have the right to ask for/view those information/records unless authorized by the AC.

10. Supplementary

This operation procedure shall be enforced after approval by the Board of Directors and any subsequent amendment thereto.

11. Appendixes

Whistleblowing Process Flowchart

12. Records

To include applicable reports or forms