



# Whistleblowing Policy

**ONE GLOVE GROUP BERHAD**  
Registration Number 200201029469(597132-A)  
Incorporated in Malaysia

Version 2.2



## Introduction

All employees of the Company and its subsidiaries (“**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 including bribery and corruption. Whistleblowing is a platform to empower the employees at all level and stakeholders to report any genuine concerns about the wrongdoing that they may have observed within the Group.

Practice 3.2 of the Malaysian Code on Corporate Governance (2021 edition) (“**MCCG**”) stipulates for the Board to establish, review and together with management implement policies and procedures on whistleblowing.

In addition, Guidance 3.2 of the MCCG stipulates that the Board should encourage employees to report genuine concerns in relation to breach of a legal obligation (including negligence, criminal activity, breach of contract and breach of law), miscarriage of justice, danger to health and safety or to the environment and the cover-up of any these in the workplace.

The Board should ensure that its Whistleblowing Policy (“**Policy**”) sets out avenues where legitimate concerns can be objectively investigated and addressed. Individuals should be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

## Objectives

This Policy is designed to uphold the Group’s efforts and commitment in doing business with honesty and integrity, henceforth establishes a clear line of communication and reporting of concerns for employees at all levels and provides a transparent and confidential process in handling the whistleblowing reports.

This Policy is implemented to:

- facilitate its employees, management, Directors and stakeholders to report instances of misconduct, wrong-doing, corruption, fraud, waste of the Company resources or abuse of rules and regulations within the Company without fear of retaliation;

- provide proper internal reporting channel to disclose any improper or unlawful conduct in accordance with the procedures as provided for under this Policy;
- provide protection for the whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such person's confidentiality;
- ensure appropriate and fair disciplinary actions taken against the alleged wrongdoers would be fair and without prejudice; and
- address a disclosure in an appropriate and timely manner.

## **Whistle-blower**

The whistle-blower's role is as a reporting party. He/she is not investigator or finder of fact, nor does he/she determine the appropriate corrective or remedial action that may be warranted. They do not have a right to participate in any investigative activities other than as requested by investigators. The whistle-blower must only whistle blow in good faith to enable protection from reprisal or retaliation.

A whistle-blower includes any of the following:

- employees of the Group, including employees on contract terms, temporary or short-term employees and employees on secondment, where applicable;
- people performing services for the Group, including contractors and service providers; and
- members of the public who are natural persons, not being incorporated or unincorporated bodies.



## **Types of misconduct or wrongdoing**

Whistleblowing is an act of disclosing information of corruption and malpractices within an organisation or a workplace.

Any person can report a whistleblowing complaint if he/she is aware of any misconduct or wrongdoing, including but not limited to:

- Fraud, theft, bribery, corruption, forgery, cheating or malpractice;
- Involvement in conflict of interest situations;
- Misappropriation or unauthorised use of the Group's funds or assets;
- Sexual harassment;
- Sale of proprietary information and/or collusion with competitors;
- Giving false information and/or acts or omissions which may cause loss to the Group;
- Non-compliance with the Company's procedures or breach of internal control;
- Failure to comply with legal or regulatory requirements; or
- Any attempt to conceal or suppress information relating to the above or other wrongdoings.

The improper conduct above is not exhaustive. It is important to note that when determining the improper conduct, it is not only measured in terms of monetary value lost, or damage to a particular business, but it may also be adversely affected to the integrity and reputation of the Group itself.

## **Protection to Whistleblower**

The Company will take all reasonable steps to protect the confidentiality of identity of a whistleblower, to the extent reasonably practicable and will adhere to any statutory requirements in force. The informant will receive whistleblower protection as per the Whistleblower Protection Act 2010.

Any employee of the Company who whistleblows will also be protected against any adverse and detrimental actions in reprisal for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith.

Such protection will continue notwithstanding that the investigation later reveals that the whistleblower is mistaken as to the facts, rules and procedures of improper conduct.

The whistleblower remains liable for his/her own conduct and is responsible to ensure that disclosure is made in good faith and free from any malicious intent. The Company does not have the power to offer any person immunity against prosecution in the criminal jurisdiction.

The Company may revoke the protection accorded to a whistleblower under the following circumstances, amongst others:

- (a) the whistleblower participated in the improper conduct;
- (b) the whistleblower willfully discloses a false statement;
- (c) the disclosure is made with malicious intent;
- (d) the disclosure is frivolous or vexatious; or
- (e) the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

## **Protection against detrimental action/retaliatory action**

Any whistleblower who believes he/she is being retaliated against must contact the Head of Human Resource immediately on the said detrimental action.

**“detrimental action”** includes:

- (a) causing injury, loss or damage;
- (b) intimidation or harassment;
- (c) interference with lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to a person’s employment, career, profession, trade or business or the taking of disciplinary action; and
- (d) a threat to take any of the actions referred to in (a) to (c) above.

An employee who takes any detrimental action against whistleblower or any employee who has made a report of improper conduct in good faith shall be subject to disciplinary action (which may include termination of employment).

## Reporting procedures

Although employees can continue to use the existing communication conduits to raise appropriate matters with their supervisors or the respective channel, under this Policy, employees can choose to lodge reports to the Company. If an employee has information or proof of any cases of corruption or malpractice, they may bring the case to the attention of the Chairman of Audit Committee.

An employee shall make a confidential report of improper conduct in writing (refer Appendix 1, Form for Reporting of Improper Conduct). The employee must provide full details of the improper conduct and supporting evidence. The whistleblower must disclose his/her identity to facilitate further investigation.

If the report is in the form of normal mail, the report is to be submitted in a confidential manner with sealed envelope, marked “**Confidential**” and “**Strictly to be opened by addressee only**” to:

### Via email

- For matters relating to financial reporting, unethical or illegal conduct, one can report directly to the following designated persons:

#### AC Chairman

Dr. Liew Lai Lai

Email: [acchair.whistleblower@oneglovegroup.com](mailto:acchair.whistleblower@oneglovegroup.com)

- For employment-related concerns, one can report directly to the following designated persons:

#### (i) Head of Human Resources

Zakwan bin Mustafa

Email: [zakwan@oneglovegroup.com](mailto:zakwan@oneglovegroup.com)

#### (ii) Executive Director

Dominic Aw Kian-Wee

Email: [dominic@oneglovegroup.com](mailto:dominic@oneglovegroup.com)

## Via post box

- For general complaint, one can submit a sealed envelope with indicative labels at the Company's post box located as follows:

Lot 73-86, Jalan Logam 5,  
Perindustrian Kamunting 3,  
Kamunting Raya Industrial Estate,  
34600 Kamunting,  
Perak Darul Ridzuan

and addressed to the Audit Committee Chairman and marked Private & Confidential |  
Opened By Addressee Only

As it is essential for the Company to have all critical information in order to be able to effectively evaluate and investigate a complaint, the disclosures made herein should provide as much detail and be as specific as possible. The disclosures should contain the following information:

- (a) Details of the person(s) involved;
- (b) Details of the allegations such as nature, time and place;
- (c) Other relevant information; and
- (d) Any supporting evidence.

All disclosures received will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

At the appropriate time, the whistleblower making the disclosures may need to come forward as a witness.

## Handling of Complaints

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 complaint received may direct to the division/department best placed to address it or lead the investigation to ensure prompt and appropriate investigation and resolution. Investigations should be launched only after preliminary consideration by the head of the respective division/department to establish that:

- 1.0 The allegation, if true, constitutes an improper act<sup>1</sup>, and either;
- 2.0 The allegation is accompanied by information specific enough to be investigated; or
- 3.0 The allegation has or directly points to corroborating evidence that can be pursued. Such evidence may be testamentary or documentary.

All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate for the conduct of the investigation and to undertake any remedial action, in accordance with any applicable laws and regulations.

The Company reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

If, at the conclusion of an investigation, the Company determines that a violation has occurred or the allegations are substantiated, remedial action commensurate with the severity of the offence will be taken.

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<sup>1</sup> Matters that do not meet this standard may be worthy of management review but should not be undertaken as an investigation of an improper conduct or malpractice.

## **Anonymous reports**

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report any improper conduct within the Group is required to disclose his/her name, identity number and contact number in order for the Company to accord the necessary protection to him. Nonetheless, these identity details will be kept confidential to accord protection to the whistleblower.

However, the Company reserves its right to investigate into any anonymous disclosure if the information is identified.

## **Confidentiality**

The Group recognises that anonymity is key to encouraging such reporting. However, to prevent false and malicious reporting, poison letters and abuse of the reporting channel, all whistleblowers must identify themselves and provide contact information in their report to facilitate further investigation.

The Company shall treat all reports or disclosures as confidential and will only reveal information on a “need to know” basis or if required by law, court of competent jurisdiction or lawful authority. The identity and particulars of the whistleblower shall also be kept confidential unless the whistleblower chooses to reveal his/her identity. Where the whistleblower chose to reveal his/her identity when making such report, written permission from the whistleblower would be obtained before the information is released.

## **Review of the Policy**

The Company reserves the right to amend the Policy from time to time to maintain compliance with applicable laws and regulations and remain effective for the Group.



### Revision to the Policy

This Policy shall be reviewed by the Board from time to time as necessary to ensure the Policy remains relevant and viable to meet the needs of the Company. Any revision to the Policy shall be recommended to the Board for consideration and approval.

<b>Version Number</b>	<b>Board's approval Date</b>	<b>Effective Date</b>
2.0	24 January 2022	24 January 2022
2.1	31 May 2023	31 May 2023
2.2	29 May 2024	29 May 2024

## Appendix 1

### FORM FOR REPORTING OF IMPROPER CONDUCT

<b>A PERSONAL PARTICULARS OF WHISTLEBLOWER</b>	
1.	Name (as per IC):
2.	I/C No./ Passport No.:
3.	Correspondence Address:
4.	Home No. <span style="float: right;">Mobile No.:</span> Office No.
5.	E-mail address:
6.	Designation / Occupation:
<b>B INFORMATION OF ONE GLOVE EMPLOYEE(S) INVOLVED IN IMPROPER CONDUCT</b>	
1.	Name of employee:
2.	Designation / position of said Employee in One Glove:
How do you know this Employee?	
<b>C DETAILS OF IMPROPER CONDUCT</b>	
Date:	Time: <span style="float: right;">Place:</span>
Details of Improper Conduct:	
<p>* Please submit supporting documents if available.                      * Please attach additional sheets if necessary.</p>	
Have you lodged a complaint on this matter to another person/ department/ authority before?	<i>(cross X where applicable)</i>
	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
If YES, please indicate the person/ department/ authority that the report was lodged: Name of organisation:	
<p>* Please attach a copy of the report made.</p>	

Date report was made:

<b>D</b>	<b>DECLARATION</b>
1.	I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.
2.	I hereby agree that all information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department/ authority/ enforcement agency for purpose of investigation.

Signature:

Name:

Date:

**FOR OFFICE USE ONLY:**

Record No.:

Officer receiving this report:

Date: