

# WHISTLE BLOWING POLICY

*This policy was updated on 7<sup>th</sup> September 2015.*

## **1. OBJECTIVE**

This policy is intended for ConnectCounty Holdings Berhad (“**the Company**”) and all subsidiary companies within the Company (hereinafter referred to as “**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 collectively referred to as “**improprieties**”).

## **2. SAFEGUARDS**

A person or entity making a protected disclosure is commonly referred to as a “**Whistleblower**”. Whistleblowers provide initial information related to a reasonable belief that an improper and/or criminal activity has occurred.

Whistleblowers are protected against being dismissed or penalised by the Group if there is no wrongdoing on their part, and the Company will consider mitigating circumstances if the Whistleblower is involved in the activity that they themselves have reported.

## **3. CONFIDENTIALITY**

Every effort will be made to treat the Whistleblower’s identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the Whistleblower to any third party not involved in the investigation or prosecution of the subject matter. The only exception to this assurance relates to an overriding legal obligation which will result in the breach of the Whistleblower’s right to 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.

## **4. PROCEDURES**

### **4.1 Process for Disclosure**

#### **4.1.1 Impropriety**

This policy covers improprieties or irregularities, suspected fraud or criminal offences, breach of confidentiality and failure to comply with legal or regulatory requirements.

#### **4.1.2 Reporting – Communication and Feedback Channels**

Managers, officers and employees in supervisory roles shall report to the reporting person(s) on any allegations of suspected improper activities. This policy should be communicated to all employees of the Company and its subsidiaries.

It is encouraged that all reports of such activities should be detailed, complete and as far as possible, accompanied with corroborating evidence.

Such disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to the designated person:

Name and Position	Email Address	Postal Address
Mr. Hong Cheong Liang <i>Audit Committee Chairman</i>	hcl.cpa@gmail.com	No. 12-1 (1st Floor), Jalan Radin Bagus 9, Sri Petaling, 57000 Kuala Lumpur, Wilayah Persekutuan

Employment-related improprieties can be reported to the following designated persons:

Name and Position	Email Address	Postal Address
Mr. Ang Chuang Juay <i>Executive Deputy Chairman</i>	cjang@rapidconn.org	No. 12-1 (1st Floor), Jalan Radin Bagus 9, Sri Petaling, 57000 Kuala Lumpur, Wilayah Persekutuan
Mr. Nicholas Chee Tiong King <i>Chief Financial Officer</i>	nicholas.chee@rapidconn.org	

Report(s) can be made verbally or in writing in the following manner:-

- (i) By Letter – to be forwarded in a sealed envelope to the below mentioned designated person labelling with a legend of “To be opened by the Audit Committee Chairman / Executive Deputy Chairman / Chief Financial Officer only” (where applicable); or
- (ii) By Email – to be forwarded vide secure email to the below mentioned designated person with the heading of “For the eyes of the Audit Committee Chairman / Executive Deputy Chairman / Chief Financial Officer only” (where applicable).

#### 4.1.3 Handling of a Reported Allegation

The action taken by the Group in response to a report of improprieties under this policy will depend on the nature of the impropriety. The Board (or designated person elected by the Board) shall receive information on each report of improprieties and follow-up information on actions taken.

#### 4.2 Investigator

The Internal Auditor shall be the investigator unless the Board assigns / appoints another investigator. The investigator must be impartial and independent of all parties concerned.

The investigator is required to report all improprieties 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 Board.

#### 4.3 Inquiries

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

If an investigation leads 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 activities that may be of violation to the Group's Code of Ethics or Conduct, the results of the investigation shall be reported to the designated persons (please refer to Section 4.1.2) 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 be dealt by Management/the Board accordingly and without prejudice.

### 5. MONITORING AND PERIODIC REVIEW

- 5.1 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.
- 5.2 The Board will review this policy annually or on an ad hoc basis to assess its relevance and effectiveness.

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