



DAIBOCHI BERHAD

(FORMERLY KNOWN AS DAIBOCHI PLASTIC AND PACKAGING INDUSTRY BHD)

(Company No.: 12994-W)

(Incorporated in Malaysia under the Companies Act)

WHISTLE-BLOWING POLICY

Policy Statement

Daibochi Berhad (formerly known as Daibochi Plastic And Packaging Industry Bhd) (Daibochi/the Company) is fully committed to the highest standards of integrity, professionalism and ethical standards in the conduct of its business and operations.

In line with this commitment, the Board has adopted a Whistle-blowing Policy (the Policy) to provide an avenue for employees and stakeholders to report genuine concerns about unethical behaviour and improper conduct within the Company without fear of reprisal should they act in good faith when reporting such concerns.

Applicability of the Policy

This Policy applies to all employees and stakeholders of Daibochi.

Objectives of the Policy

- (i) Deter wrongdoing and promote standards of good corporate practices in line with Daibochi's Code of Conduct and Ethics;
- (ii) Provide proper avenues for employees and stakeholders to raise concerns about actual or suspected improprieties in matters of financial reporting, irregularities in conducting business or other matters and to receive feedback on any action taken;
- (iii) Provide clear procedures for the reporting of such matters;
- (iv) Protect a whistle-blower from reprisal as a consequence of making a disclosure;
- (v) Manage all disclosures in a timely, consistent and professional manner; and
- (vi) Assist to develop a culture of openness, accountability and integrity.

Scope of the Policy

The following matters are covered by this policy:

- Fraud;
- Improprieties (including financial, operational and in matters of financial reporting);
- Corruption, bribery or blackmail;
- Criminal offences or any breach of the laws of Malaysia;
- Failure to comply with a legal or regulatory obligation;
- Endangerment of an individual's health and safety;
- Danger to the environment;

- Concealment of any or a combination of the above.

The above list is not exhaustive and there will be instances where employees and stakeholders would need to exercise judgement.

Reporting procedure

Employees and stakeholders who reasonably and in good faith believe that malpractices exist within the Company are able to report their concerns to any of the following contact persons:

- Audit Committee Chairperson – Ms Caroline Ang Choo Bee
By phone: +603 79567608
By mail: CW Integrated Consultancy Services Sdn Bhd
B-1-15, Block B, 8th Avenue,
Jalan Sungai Jernih 8/1,
Section 8, 46050 Petaling Jaya,
Selangor, Malaysia.
(marked “**Strictly Private and Confidential**”)
By email: caroline@cwics.com.my
- Independent Non-Executive Director - Mr Heng Fu Joe
By phone: +603 2297 1000
By mail: Baker Tilly Monteiro Heng
Baker Tilly MH Tower, Level 10, Tower 1,
Avenue 5, Bangsar South City, 59200 Kuala Lumpur
(marked “**Strictly Private and Confidential**”)
By email: joeheng@bakertillymh.com.my
- Independent Non-Executive Director - Mr Faris Salim Cassim
By phone: +60124936681
By mail: Novis Pte Ltd,
Penthouse 16-1, Level 16, Wisma UOA Damansara II,
No. 6, Changkat Semantan, Damansara Heights, 50490 Kuala Lumpur
(marked “**Strictly Private and Confidential**”)
By email: faris@noviscap.com

Reporting should be made as soon as is practicable. It is essential for Daibochi to have all critical information in order to be able to effectively evaluate and investigate the concerns raised. The whistle-blower must disclose his/her identity and the disclosure must at least have details of the person(s) involved, the nature of allegation, when and where the incident took place and supporting evidence, if any. The identity of the whistle-blower will be kept confidential. However, consent from the whistle-blower will be sought should there be a need to disclose his/her identity for investigation purposes.

Acting in Good Faith

Daibochi expects all parties to disclose the information in good faith and not make false allegations. If the disclosure is not made in accordance with this Policy, for instance, if the complaint is found to be dishonest, mischievous or malicious, Daibochi may take necessary action, including legal action, where appropriate, against the party or parties responsible.

This Whistleblowing policy has been approved by the Board on November 20, 2017