

WHISTLEBLOWING POLICY

1. Introduction

Turbo Mech Berhad and Group of Companies (“Group”) is committed to the highest standard of integrity and maintaining high standard of accountability in the conduct of business and operations. In line with the commitment to promote transparency, accountability and ethics and to ensure high standards of corporate governance is being upheld in the workplace, the Board and Management encourages its employees and external parties to report suspected and/or known instances of wrongdoing involving the Group’s employees and its assets in accordance with this Policy.

External parties shall include but not be limited to customers, suppliers, professional advisers and any other third party providing services to the Group.

Employees and any external party whistleblowing / reporting wrongdoing are hereinafter referred to as “Reporting Individual(s)”.

2. Objectives

The objective of this Policy is to protect the value of transparency, integrity, impartiality and accountability where the Group conduct its business and affairs.

The policy provides and facilitates a mechanism and process for the Reporting Individual to report any wrongdoing and provide assurance of protection in accordance with the procedures in this Policy.

3. Definition of Whistleblowing

“Whistleblowing” is defined as the deliberate, voluntary disclosure or reporting of an individual or organisational malpractice by any person on an actual or suspected improper conduct within the Group.

Any person (s) can report a complaint if he or she is aware of any Wrongdoing, including but not limited to the following:-

- Fraud
- Misappropriation of assets
- Criminal breach of trust
- Illicit and corrupt practices
- Sexual harassment
- Misuse of confidential information
- Giving false or misleading information
- Concealment of any of the above matter or other acts of Wrongdoing

4. Confidentiality and Protection of Reporting Individual

All reports or disclosures of the Reporting Individual shall be kept confidential and shall only be revealed if required by law, the courts or authorities.

Reporting individual's identity will be accorded with protection of strict confidentiality unless otherwise required by law or for purposes of any actions by or against the Group.

Any person who has not acted in good faith shall not be entitled to any protection under this Policy. If allegations are proven to be malicious or founded on bad faith, parties responsible may be subject to appropriate action, including but not limited to legal action, where applicable.

The report should be accurate and factual and not made with malicious intent, based on office gossip or made for purposes of personal advantage or gain. Appropriate action will be taken against the Reporting Individual if his or her allegations are found to be frivolous, malicious or vexatious or if he or she has participated in the wrongdoing.

The Group provides assurance to the Reporting Individual against any reprisal or retaliation for disclosing wrongdoing from his superior, manager or department head and also against disciplinary action, provided the report is in good faith.

5. Reporting procedure

The Reporting Individual should report any instances of improper conduct to the Group CEO first in order that the Group CEO may remedy any wrongdoings and where applicable, institute appropriate controls to prevent any damage or loss to the Group.

However, if Reporting Individual fail to report to the Group CEO, for whatever reason, then the Reporting Individual shall report the concerns in writing to the Audit Committee Chairman.

The written report may be done via one of the following channels:

E-mail to whistle@turbomech.com.my

The e-mail address will be administered by the Audit Committee Chairman.

Letters/documents/reports to be addressed to:

Chairman of Audit Committee
C/O Company Secretary of Turbo-Mech Berhad
Lot 6.05, Level 6, KPMG Tower
8 First Avenue, Bandar Utama
47800 Petaling Jaya
Selangor Darul Ehsan

The Reporting Individual may report to the above individuals, as appropriate, in a properly sealed letter in an envelope labelled "STRICTLY PRIVATE AND CONFIDENTIAL - TO BE OPENED BY THE ADDRESSEE ONLY".

The Reporting Individual should reveal his or her identity when reporting the suspected and/or known instances of wrongdoings.

For the report that was made via the email the Chairman of Audit Committee shall review the report before determining whether there is an investigation to be carried out. The Chairman of Audit Committee will perform the initial investigation in consultation with the Chairman of the Board. Should there be no appropriate basis to form an investigation then the Chairman of Audit Committee will advise the Chairman of the Board of such decision.

For reports received via letters, the Corporate Secretary shall perform his initial review on the report and will determine if there is a need to carry out an investigation.

An investigation that is to be carried will be advised to the Audit Committee for consideration and further action. Should the issue cannot be resolved and warrants further investigation, the Audit Committee may set up an investigation committee who shall conduct further investigation.

6. **Reporting and Retention of Reports and Investigations**

The Corporate Secretary shall maintain a log of all reports, tracking their receipt, investigation and resolution and shall prepare a periodic summary thereof for the Chairman of Audit Committee. The Audit Committee shall be updated as and when there are cases reported.

7. **Revision**

This Policy will be reviewed and updated from time to time. Any revision or amendment to this Policy will be subjected to the approval of the Board.