

WHISTLEBLOWING POLICY

A. BACKGROUND, PURPOSES AND SCOPE

99 Speed Mart Sdn Bhd and its subsidiaries (“**99 Speedmart**”) are committed in ensuring, establishing and preserving a professional work culture that is free from any corruption activities and exercising a work culture that promotes the employees to feel encouraged, confident and safe to raise any matters or issues regarding any misconduct that may affect and impact 99 Speed Mart’s integrity.

99 Speed Mart. is devoted to the values of pellucidity, accuracy, clarity, integrity and accountability in respect of its business, affairs and daily conducts.

Whistle-blowing is a form of disclosure that is done by a “Whistleblower”. “Whistleblower” in this Whistleblowing Policy is defined as a person who raises serious concerns at an early stage about risks of wrongful activities or reporting a wrongdoing.

A Whistleblower can lodge a Whistleblowing complaint of any of the wrongdoings including but not limited to these following issues:-

- Fraud;
- Corruption;
- Misappropriation of assets;
- Serious financial impropriety;
- Criminal breach of trust;
- Sexual harassment;
- Illicit and corrupt practices;
- Questionable or improper accounting;
- Misuse of confidential information; or
- Acts or omissions which are deemed to be against the interest of 99 Speed Mart, laws, regulations, or public policies.

B. REPORTING PROCEDURES

- 1) Who can disclose?
Any of the following Whistleblowers can make a disclosure:-
 - 99 Speed Mart’s employees, (*including employees on contract terms, temporary or short-term employees*);
 - People performing services for 99 Speed Mart including but not limited to service providers and contractors;
 - Members of the public who are natural persons.
- 2) What to disclose?
Any matters relating to any of the wrongdoings listed under **Clause A.** above.

- 3) When to disclose?
Whistleblower shall come forward with his/her evidence i.e. documentations or any information that he/she reasonably believes in good faith that a wrongdoing is likely to happen/is being committed or has been committed.
- 4) How to lodge a disclosure?
i) A disclosure can be lodged via mail or email to Whistleblowing Team.
a. Mail: Lot PT 2811, Jalan Angsa Taman Berkeley 41150 Klang. Selangor
b. Email: whistleblower@99speedmart.com.my

The Whistleblowing Team members comprises of Chief Executive Officer, Head of Internal Audit Team and Head of Human Resource. In the event any of the aforesaid three (3) mentioned parties, whether directly or indirectly, is the complaine, in a case, then the party would be required to excuse himself/ herself from the case.

C. INVESTIGATION

Upon receiving such disclosure from the Whistleblower, 99 Speed Mart will initiate the investigation. The manner of the investigation vests solely on 99 Speed Mart as it deems appropriate, reasonable and necessary. The Whistleblower shall give his/her full cooperation for the investigation and this might include to attend meetings with 99 Speed Mart.

D. WHISTLEBLOWER'S PROTECTION

Upon lodging the disclosure in good faith, based on reasonable grounds and in accordance with the procedure, the Whistleblower is assured:

- To be protected from reprisal within 99 Speed Mart as a direct consequence of the disclosure;
- To be kept confidential his/her identity unless otherwise required by law or for the purpose of any proceedings by or against 99 Speed Mart.

99 Speed Mart does not abide to any form of victimization, harassment, bullying and any other detrimental treatment as consequences to the disclosure.

E. TO ACT IN GOOD FAITH AND POSSESSED REASONABLE GROUNDS

99 Speed Mart shall only entertain disclosure or complaints made in good faith and the disclosure shall be made in reasonable grounds by a reasonable man. If disclosures are proven to be malicious and contain the elements of defamation, parties concerned may be subjected to appropriate action and this includes legal proceedings, if applicable.

F. CONFIDENTIALITY

99 Speed Mart will treat any disclosure or complaint as confidential and sensitive matters and any information shall be kept in its confidentiality unless otherwise required by law.