



WHITE HORSE BERHAD
[Registration No: 199701039630 (455130-X)]
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY AND PROCEDURES

INTRODUCTION

1. White Horse Berhad (“**the Company**”) and its subsidiaries (“**the Group**”) are committed to the highest standard of corporate governance and business integrity.
2. This policy facilitates the whistle blower to report or disclose through established channels about any violations or wrongdoings they may observe in the Group without fear of retaliation and should they act in good faith when reporting such concerns.
3. The policy does not apply to or change the Company’s policies and procedures for individual employee grievances or complaints relating to job performances, employment terms and conditions. Such concerns will be channeled to the Human Resources Department for further reviewing.
4. Only genuine concerns should be reported under the whistle blowing procedures. The report should be made in good faith with a reasonable belief that the information and any allegations in it are substantially true and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

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. The whistle-blower does not have a right to participate in any investigative activities other than as requested by investigators.

A whistle-blower includes any of the following:-

- employees of the Company, including employees on contract terms, temporary or short-term employees and employees on secondment, where applicable.
- people performing services for the Company, including contractors and service providers.

- members of the public who are natural persons, not being incorporated or unincorporated bodies.

REPORTING PROCEDURE

This Policy is intended to complement the normal channels of communication and reporting lines within the Group.

1. Parties can report if they are aware of any wrongdoing, including but not limited to the following:-
 - Acceptance of favour
 - Fraud
 - Misappropriation of assets
 - Racial, sexual harassment, disability or other discrimination
 - Criminal breach of trust
 - Corruption
 - Misuse of confidential information
 - Questionable or improper accounting
 - Acts or omissions which are deemed to be against the interest of the Group, laws, regulations or public policies
 - knowingly directing or advising a person to commit any of the above wrongdoing conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
2. Any concern should be raised with immediate superior. If for any reason, it is believed that it is not possible or appropriate, then the concern should be reported to the Group's Managing Director. Channel of reporting as follows:-

Name : Liao Shen Hua
 Email : whb@whitehorse.com.my
 Facsimile : 607- 2511 011
 Mail : White Horse Berhad
 Plo 464, Jalan Gangsa,
 Pasir Gudang Industrial Estate,
 81700, Pasir Gudang, Johor
 Mark : **Strictly Confidential**

3. If for any reason, it is believed that reporting to management is a concern or not possible or appropriate, then the concern should be reported to the Audit Committee of the Company. Channel of reporting as follows:-

The Audit Committee

Facsimile : 603-2094 9940
 Mail : c/o Securities Services (Holdings) Sdn. Bhd.
 Level 7, Menara Milenium, Jalan Damanlela
 Pusat Bandar Damansara, Damansara Heights
 50490 Kuala Lumpur
 Mark : **Strictly Confidential**

4. A disclosure shall include at least the following particulars:-
- his/her name, designation, current address and contact numbers;
 - basis or reasons for his/her concerns, for instance, its nature, the date, time, and place of its occurrence and the identity of the alleged wrongdoer;
 - particulars of witnesses, if any; and
 - particulars or the production of documentary evidence, if any.

The whistle-blower may be asked to provide further clarification and information from time to time, for example, if an investigation is conducted.

BEING INFORMED AND HAVING THE OPPORTUNITY TO BE HEARD

The whistle-blower shall be informed of the status of his/her disclosure matter as far as reasonably practicable. The whistle-blower and the alleged wrongdoer are expected to give his/her full cooperation in any investigation or any other process carried out pursuant to this Policy.

The alleged wrongdoer may be asked to attend a meeting to discuss the allegations and must take all reasonable steps to attend the meeting. He/she shall be given an opportunity to answer the allegations at the meeting, and his/her own answers shall be recorded in the minutes of the meeting. The meeting may be adjourned for the Company to obtain any advice or proceed with further investigations. A meeting may not necessarily be held within the early stages of an investigation.

In the event the whistle-blower is implicated or discovered to be or have been involved in any wrongdoing, he/she may also be investigated so as to complete the fact-finding process. An investigation is not and shall not be treated as a reprisal against the whistle-blower. It is to facilitate decision making. The whistle-blower may then be asked to attend a meeting to discuss the allegations and must take all reasonable steps to attend that meeting. He/she shall be given an opportunity to answer the allegations at that meeting, and his/her own answers shall be recorded in the minutes of that meeting. That meeting may be adjourned for the Company to obtain further advice or proceed with further investigations.

The whistle-blower, and if applicable, the alleged wrongdoer shall be notified in writing of the decision on the wrongdoing (e.g. whether the wrongdoing occurred or not; or whether the alleged wrongdoer is guilty or not), and the basis thereof.

ACTIONS AND CONSEQUENCES OF WRONGDOING OR WRONGFUL DISCLOSURE

1. All reports will be investigated promptly by the person receiving the report or disclosure. If required, assistance from other resources within the Group.
2. Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Decision taken by the Audit Committee will be implemented immediately.
3. Where possible, steps will also be implemented to prevent similar situation from recurring.

4. The Audit Committee will report to the Board of Directors on a periodic basis about the reports received and actions taken.
5. If the disclosure involves a Director, the disclosure shall be referred directly to the Board of Directors who shall then be responsible for the investigation and recommendation to the Board of Directors of the Company. The Board of Directors has the authority to make final decisions.

ACTING IN GOOD FAITH

Only genuine concerns should be reported under this Policy. The report should be made in good faith with a reasonable belief that the information and any allegations are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and if proven may lead to appropriate disciplinary action, up to and including legal action, where appropriate.

CONFIDENTIALITY

All reports submitted will be treated in confidence and reports will be maintained in strict confidentiality of the employees, directors or any stakeholders' identity consistent with the needs to conduct an adequate investigation. The information obtained and will only be revealed on a "need to know" basis or if required by law, court or authority.

REVIEW AND REVISION TO THE POLICY

The Group may modify this policy from time to time, as and when necessary, to maintain compliance with applicable laws and regulations or accommodate organisational changes within the Group. Changes to the Policy, if any, shall only be made with the Board's approval in writing.