



I-BERHAD (7029-H)

WHISTLE BLOWING POLICY

A. INTRODUCTION

In line with corporate governance practices as prescribed in the Malaysian Code on Corporate Governance 2012, the Board and Management of I-Berhad (“the Company” or “I-Berhad”) encourage its employees and associates (“the reporting individual”) to report suspected and/or known misconduct, wrongdoings, corruption and instances of fraud, waste, and/or abuse involving the resources of the Company.

B. OBJECTIVES

The objective of this policy is to provide and facilitate a mechanism for any reporting individual to report concerns about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse.

C. SCOPE & DEFINITION

i. Improper Conduct

Any conduct which if proven, constitutes a disciplinary offence or a criminal offence.

ii. Fraud

Fraud is the act of making false representations of material facts whether by words or conduct, by concealing information, or by making misleading statements in order to obtain some benefits or payments that would otherwise not exist.

Fraud includes (but not limited to) any questionable accounting practices or irregularities in the Company’s reported financial statements and non-compliance with the Company’s internal financial controls and procedures.

These acts may be committed either for the reporting individual’s own benefit, or for the benefit of some other party. These acts must have been committed knowingly, wilfully and intentionally.



iii. Abuse

Abuse consists of practices that cause unnecessary costs to the Company. Abuse can be similar to fraud, except that it is not necessary to prove that abuse was performed knowingly, wilfully and intentionally.

iv. Waste

Waste is spending money or using resources on goods or resources in excess of actual need. Waste does not necessarily produce a benefit for the reporting individual, but is an act of poor management of resources.

D. POLICY & PROTECTION

(i) Anonymity

It is the policy of the Company to allow the reporting individual to either identify themselves or if they prefer, to remain anonymous when reporting suspected and/or known instances of misconduct, wrongdoings, corruption, fraud, waste and/or abuse.

(ii) Assurance against reprisal and/or retaliation

Where the reporting individual has chosen to reveal his/her identity, it is the policy of the Company to provide assurance that the reporting individual would be protected against reprisals and/or retaliation from his/her immediate superior or head of department/division.

In addition, the Company provides assurance that no disciplinary action can be taken against the reporting individual as long as he/she does not provide false information in the report "*purposely, knowingly or recklessly*" i.e. the report is basically malicious in nature.

(iii) Confidentiality

The Company shall treat all reports or disclosures as sensitive and will only reveal information on a "need to know" basis or if required by law, court or authority.

The identity and particulars of the reporting individual shall also be kept private and confidential unless the reporting individual chose to reveal his/her identity.

Where the reporting individual has chosen to reveal his/her identity when making such a report, written permission from the reporting individual would be obtained before the information is released.



(iv) Immunity

All costs in relation to any legal liabilities or proceedings (whether criminal or civil) that may be brought against the reporting individual shall be borne by the Company and the selection of the lawyer defending the legal action shall be made by the Company.

(v) Protection

The reporting individual shall also be protected against:-

- (a) action causing injury, loss or damage;
- (b) intimidation or harassment;
- (c) interference with the lawful employment or livelihood of the reporting individual, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the reporting individual's employment, career, protection, trade or business or the taking of disciplinary action; and
- (d) a threat to take any of the actions referred to in paragraphs (a) to (c) above.

E. REVOCATION OF POLICY & PROTECTION

The protection stated in Section D above shall be revoked by the Company if:-

- i. the reporting individual himself has participated in the improper conduct, wrongdoings, corruption, fraud, waste, and/or abuse;
- ii. the reporting individual wilfully or maliciously made his disclosure, knowing or believing the information is false or untrue;
- iii. the disclosure is frivolous or vexatious; or
- iv. the disclosure is made with the intention or motive to avoid dismissal or other disciplinary action.