

PETALING TIN BERHAD

WHISTLE BLOWING POLICY

1. Preamble

The Company is committed to conduct its affairs in an ethical, moral and legal manner and to present accurate and factual information to guide the Board, its shareholders and investors in making informed decision.

Cognizant of the above mentioned values, the Company provides avenue for all employees and associates to report any improper conduct within the Company.

2. Objective

The primary purpose of this whistleblowing policy (the Policy) is to govern the reporting and handling of wrongdoing in the Company. This Policy does not replace the Company's existing policy for handling employee grievances or similar complaints but to facilitate employees and associates to report suspected and/or known misconducts, corruption and instances of fraud and of the Company's resources.

3. Scope

Any irregularity and improper conduct, including but NOT limited to the following:-

- Fraud or Dishonesty
- Breaches of Policies, Procedures, Laws and Regulations
- Bribery, Corruption
- Abuse of Power
- Conflict of Interest
- Theft or Embezzlement
- Insider Trading
- Misuse of Company's Assets and Information
- Harassment, Sexual Harassment and/or
- Intimidation

4. Reporting in Good Faith

The Company expects all parties to act in good faith and have reasonable grounds when making a report. If allegations are made with malicious intent, the Company will take appropriate action against the parties concerned, including legal action, where applicable.

5. Protection to Whistleblower

- 5.1 The Company will accord protection of confidentiality to the whistleblower to the extent reasonably consistent with the need to conduct an adequate investigation.

- 5.2 The Company will take all reasonable steps to protect the whistleblower against any discrimination, retaliation or harassment, corresponding to its internal policies and scope under its purview and jurisdiction. The protection may be revoked under the following circumstances, amongst others:-
- a) the whistleblower participated in the improper conduct;
 - b) the whistleblower willfully discloses a false statement;
 - c) the disclosure is made with malicious intent.

6. Anonymous Whistleblower

An anonymous disclosure may not be entertained. Any employee or associates who wish to report improper conduct are encouraged to disclose his identity (name, IC and contact details) to the Company to facilitate follow-up enquiries and in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

7. Reporting Wrongdoing

The whistleblower should report the suspected or instance of wrongdoing in confidence to the Head of Group Human Resources, Head of Group Internal Audit or any other independent investigators appointed by the CEO. The report should be in writing, to ensure that there is a clear understanding about the issues raised. All disclosures made herein should contain the following information:-

- a) details of the person involved;
- b) nature of the allegation and where and when the alleged misconduct/wrongdoing took place;
- c) other relevant information; and
- d) supporting evidence, if available.

The whistleblower may seek follow up information about the outcome of the investigation, subject to legal limitations.

All investigators are independent and they are required to conduct their investigations and analysis in a fair and objective manner whilst upholding utmost legal and professional standards.

All investigation reports shall be tabled to the Audit Committee which has the authority to ensure effective implementation of the Whistleblower Policy. The Audit Committee shall update the Board of Directors on reports that require their attention and approval.

8. Review of Policy

The Policy is approved and adopted by the Board. The Board shall periodically review this policy to ensure its effectiveness and appropriateness.

The Policy is made available for reference in the Company's website at www.petalingtin.com.