

## **1. Purpose**

The Board of Directors of Leader Steel Holdings Berhad (“LSHB” or “the Company”) is committed to achieving and maintaining the highest standard of work ethics in its business conduct in line with the Code of Conduct and Code of Ethics adopted by the Board, and good governance practices.

This policy is intended for LSHB and all its subsidiary companies (collectively referred to as “the Group”). This policy is in line with the provisions in the Whistleblower Protection Act, 2010.

This policy is designed to provide an avenue for all employees of the Group, suppliers, customers or members of public to disclose any improper conduct, malpractices, irregularities or wrongdoings in the Group and to provide protection to the persons who reported such matters of concern (“hereinafter referred to as “Whistleblower”).

## **2. Confidentiality**

LSHB will treat all whistleblowing reports in a confidential and sensitive manner and will only reveal information on a “need-to-know” basis or if required by law, court or authority.

Employees who have raised concerns internally will be informed of who is handling the matter and how they can contact them if further assistance is required.

Whistleblower’s identity will not be disclosed without his/her prior consent. Where subject matter cannot be resolved without revealing the identity of the whistleblower, the Company will enter into a dialogue with the whistleblower so as to determine how the matter can be resolved.

## **3. Safeguards**

Whistleblowers who are employees of the Group are protected against being dismissed or penalised by the Group, and LSHB will consider mitigating circumstances if the whistleblower himself/ herself is involved in the activity that he/she reports.

A Whistleblower’s right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

All whistleblowing report must be made in good faith, otherwise disciplinary action may be taken against the whistleblower.

## **4. Procedures**

### **4.1 Process for Disclosure:**

#### **(a) Reporting**

Whistleblowing report can be filed in one of the following manner:

- i. By way of email to [whistleblower@leadersteel.my](mailto:whistleblower@leadersteel.my)
- ii. By way of a sealed envelope to the Managing Director (“MD”), Leader Steel Holdings Bhd, Wisma Leader Steel, Plot 85 Lorong Perusahaan Utama, Kawasan Perusahaan Bukit Tengah, 14000 Bukit Tengah, Pulau Pinang

Any matter which is deemed inappropriate to be reported to the MD shall be addressed to the Chairman of the Board.

#### **(b) Handling of a reported allegation**

Upon receiving such concern, depending on the severity of the matter reported, the MD has the authority to accept or reject the report. In the event the report is accepted, the MD has the authority to decide on the manner of which such matter shall be handled.

If there is a need, the MD may refer the matter to the appropriate enforcement authority.

## **5. Monitoring and Periodic Review of Policy**

This Policy is adopted by the Board of LSHB on 24 Feb 2022.

This policy will be reviewed from time to time by the Board when deem necessary.