



AME ELITE CONSORTIUM BERHAD

Registration No. 201801030789 (1292815-W)

(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1. POLICY STATEMENT

AME Elite Consortium Berhad (“**AME**” or “**Company**”) and its subsidiaries (“collectively referred to as the “**Group**”) are committed to achieve and maintain high standards of corporate ethics.

The Company expects its employees to conduct themselves in a professional manner and carry out matters in compliance with all applicable laws and regulations as well as the Group’s Code of Conduct and Ethics.

The Company encourages any party to report or disclose suspected improper conduct within the Group in an appropriate manner, in line with the good corporate governance practices.

2. SCOPE

This policy applies to all employees, contractors, suppliers, business associates, customers, bankers and any other parties who have dealings with the Group.

3. TYPES OF IMPROPER CONDUCT

Improper conduct includes but not limited to the following:

- Fraud;
- Misappropriation of assets;
- Sexual harassment;
- Abuse of power and position;
- Criminal breach of trust;
- Blackmail or corrupt practices;
- Improprieties and irregularities in accounting and financial reporting;
- Misuse of confidential information;
- Acts or omissions which are deemed to be against the interest of the Group, laws, regulations, requirements of statutory bodies or public policies;
- Giving false or misleading information (including suppression of any material facts or information);
- Violation of the Group’s Code of Conduct and Ethics;
- Breaches of Group Policies;

- Danger to health and safety of any employee or any other individual; or
- The deliberate concealment of any of the above matter or other acts of wrongdoings.

4. PROTECTION

4.1 Acting in good faith

The Company expects all reports to be made in good faith and with reasonable grounds supporting the information.

4.2 Anonymity

Any anonymous report will not be entertained. A reporting individual (“**Whistleblower**”) is required to provide his/her identity and contact information in the reports in order for the Company to accord the necessary protection. However, the Company reserves its right to investigate any anonymous report.

4.3 Confidentiality

The Company will treat all reports and information provided as confidential and will only reveal them on a “need to know” basis for the purposes of investigating the reports.

4.4 Assurance against reprisals and/or retaliation

A Whistleblower who acts in good faith shall be protected against reprisals and/or retaliation.

5. PROCEDURE

Any party who is aware that any improper conduct has been, is being or likely to be committed within the Group shall report in writing (sealed mail or e-mail) to the Chairperson of the Company’s Nomination Committee (“**Whistleblowing Officer**”) as follows:

Name	: Chang Tian Kwang (Chairperson, Nomination Committee)
By mail	: Boardroom Corporate Services Sdn. Bhd. (Johor Branch) Suite 9D, Level 9, Menara Ansar, No. 65 Jalan Trus, 80000 Johor Bahru, Johor Darul Takzim, Malaysia.
Via e-mail	: whistleblow@ame-elite.com

To ensure completeness of the required information, a Whistleblower is strongly encouraged to report with the whistleblowing form which is available on the Company’s website at <https://ame-elite.com>.

Once a whistleblowing report is made, the Whistleblowing Officer shall, as soon as practicable, take necessary actions to deal with the concerns raised, which include, but are not limited to, the following:

- (a) to refuse acceptance of the concerns raised either in part or in whole if they fall outside of this Policy; or
- (b) to direct the concerns raised to be dealt with the Group’s policies such as disciplinary process; or
- (c) to instruct a full-scale investigation be made on the concerns raised; or
- (d) to appoint external party such as auditors or solicitors to conduct further investigation on the concerns raised; or
- (e) to instruct report of the concerns raised to enforcement agencies such as Polis Diraja Malaysia (“PDRM”), Malaysian Anti-Corruption Commission (“MACC”) and Suruhanjaya Syarikat Malaysia (“SSM”).

The Whistleblowing Officer shall prepare a summary report and present it to the Company’s Audit and Risk Management Committee on a quarterly basis.

The Company will maintain a record of all whistleblowing reports and will track their receipt, investigation and resolution.

7. REVIEW

This policy shall be reviewed by the Board every three (3) years or as required when internal or external events warrant a more frequent review to be undertaken.

This Policy was adopted by the Board on 26 February 2020.