



Whistle Blowing, Ethics & Compliance Policy

SCOPE:

This policy applies to all companies within the Unisem Group.

This includes directors, full-time, part-time, contract, temporary employees, suppliers, customers and any 3rd party.

PURPOSE:

This policy in particular enable prevention and detection of fraud and misconduct in respect of accounting, internal controls, auditing matters and reporting and corruption, therefore ensuring the financial integrity, security and reputation of Unisem.

It summarises the ways in whistle blow process in order to ensure we do business in an ethical and compliant manner. It is essential that you always ask questions and report any actual or suspected violations of the Unisem Code of Ethics.

We encourage you to whistle blow (anonymously if you wish) by providing various communication channels and a clear process for resolving Reported Matters. We also recognise it is important to ensure that you are not retaliated against for whistle blow in Good Faith.

The purpose of this policy is to:

- Develop a culture of openness, accountability and integrity.
- Encourage you to whistle blow, to raise questions and report any concerns you have over any Alleged Misconduct that enable management to be informed at an early stage and formulate corrective action in a timely manner.
- Outline the various communication channels available to you to whistle blow (anonymously if you wish) as well as the processes for resolving any Reported Matters.
- Reassure you that *no retaliation* will be tolerated against you for whistle blow in Good Faith.



DEFINITION:

<i>Definition</i>	<i>Examples</i>
<p>Alleged Misconduct means actual or suspected misconduct or unethical business practices within Unisem or by any Third Party with whom Unisem does business and includes:</p> <p>Violation of laws and regulations</p> <p>A criminal offence</p> <p>Intentional provision of incorrect information to public bodies</p> <p>Violation of the Code of Ethics of Unisem</p> <p>Intentional suppression, destruction or manipulation of information regarding the facts in connection with any of the above</p> <p>Circumstances that can directly or indirectly damage Unisem’s reputation in some way</p>	<p>Committing a criminal offence (e.g. fraud or theft)</p> <p>Submitting a false expense claim or falsifying books and records</p> <p>Violations of the Code of Ethics and other Group policies.</p> <p>Theft of company property or inventory</p> <p>Failure to follow Environment, Health or Safety regulations</p> <p>Unauthorized disclosure of confidential information</p> <p>Discrimination or harassment, including sexual harassment</p> <p>Retaliation against a person for whistle blowing</p>
<p>In Good Faith means:</p> <p>without malice, false accusations or consideration of personal benefit</p> <p>when you have a reasonable basis to believe the Reported Matter is true</p> <p>A Reported Matter does not need to be proven true to be made in Good Faith.</p>	<p>Reporting a matter to embarrass someone or put them under suspicion when you have no reasonable grounds to believe they have done anything wrong</p>



Definition	Examples
<p>An Investigator is the person assigned to investigate a Reported Matter in accordance with this policy.</p>	<p>Internal personnel who appointed to be an investigator</p> <p>An internal Investigator may be the Internal Audit member and legal counsel</p> <p>Whistle blower's role is as a reporting party. They are not investigators or finders of facts, nor do they determine the appropriate corrective or remedial action that may be warranted.</p>
<p>A Reported Matter is any matter that is reported through the various communication channels in accordance with this policy.</p>	<p>A matter reported on Alleged Misconduct through the various communication channels.</p>
<p>To whistle blow means to ask questions and report any concerns you have over any Alleged Misconduct using the various communication channels available to you under this policy, including anonymously if you wish.</p>	<p>You should refer to the definition of Alleged Misconduct.</p>



PROCEDURE:

General Principles

Basic Principles	Explanation
<p>1. This policy covers asking questions and reporting concerns you have over <u>Alleged Misconduct</u> – whistle blow, including anonymously if you wish.</p>	<ul style="list-style-type: none"> • This policy is tailored for you to report/ ask incident that you have over any alleged misconduct to ensure compliance to Unisem Code of Ethics • It is not intended to cover work related issues, employee complaints that should primarily be handled by your manager or Human Resource Manager via the respective sites Grievance Procedures.
<p>2. You have a responsibility to whistle blow in Good Faith using the various communication channels.</p>	<ul style="list-style-type: none"> • Acting in Good Faith when you whistle blow. Anyone who knowingly or recklessly speaks up without Good Faith may be subject to disciplinary action. • You should not attempt to investigate or resolve a Reported Matter on your own. • Any manager who receives a report of Alleged Misconduct must either take action to resolve the issues or escalate it.
<p>3. Reported Matters will be handled on a confidential and impartial basis.</p>	<ul style="list-style-type: none"> • Any action taken will be conducted in a professional, objective, unbiased and sensitive manner with the aim of either substantiating or invalidating the Reported Matter.
<p>4. No retaliation will be tolerated against you for whistle blow in Good Faith.</p>	<ul style="list-style-type: none"> • Whistle blow in good faith will not be retaliated. • Retaliation includes dismissal, demotion, suspension, harassment or other forms of discrimination. • It does not matter if the Alleged Misconduct



	<p>proves to be incorrect or unsubstantiated if you whistle blow in Good Faith.</p> <ul style="list-style-type: none">• Anyone who retaliates against another person will be subject to disciplinary action.
5. You may whistle blow anonymously if you wish.	<ul style="list-style-type: none">• Investigation will be carried out to investigate matters reported anonymously to the extent it is believed they could be true and possible with whatever information has been provided.• Matters reported anonymously are more difficult to investigate and resolve and therefore you are encouraged to identify yourself whenever possible.
6. Exclusion	<ul style="list-style-type: none">• This policy does not include complaints relating to job performance, terms and conditions of employment unless there is an abuse of power by Company Officials while discharging their duties pertaining to the items in this exclusion.



Reporting

The Alleged Misconduct involves management the following communication channels are available.

Your Communications Channels	
	Talk to or Email or in Writing to (Anonymously if you wish)
Corporate Level	<p>Group COO/ Corporate VP HR Unisem (M) Berhad Address: No 1, Persiaran Pulau Jaya 9 Kawasan Perindustrian Pulau Jaya 31300, Ipoh, Perak Ethics hotline : +6012 533 4890 (International) Available during working hours from 8:00am (+0800 UTC) to 5:45pm (+0800 UTC), Monday to Friday. Email Address : ethicsqueries@unisemgroup.com</p>
Director Level	<p>Senior Independent Director Unisem (M) Berhad Letter Box #95, 9th Floor, UBN Tower No 10, Jalan P. Ramlee 50250 Kuala Lumpur Malaysia. Email Address : sr.ind.director@unisemgroup.com</p>

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, department manager, Country Human Resources Manager or to the Country COO.



Resolution Process

The person who receives the Reported Matter will notify the person making the report and acknowledge the Reported Matter within 5 business days of receiving it, unless it is an anonymous report.

Details of the Reported Matter will be sent as soon as possible to the Corporate VP HR, unless it was the Corporate VP HR who initially received the Reported Matter. Immediate action will be taken to open a file and keep in a safe location to protect the confidentiality of the Reported Matter and person making the report. If the Corporate VP HR is somehow involved in the Reported Matter, the Group COO will replace the Corporate VP HR in this process.

The Corporate VP HR and the GCOO/Senior Independent Director will discuss the Reported Matter to:

- Identify the nature of the Alleged Misconduct and confirm it is covered by this policy.
- Identify the most effective and appropriate process to handle the Alleged Misconduct. This may include an initial interview with the person making the report (if applicable), making initial inquiries to decide whether an investigation is required and if so, assigning an Investigator.
- Estimate timelines for required action.
- Decide whether the person making the report needs any additional support, in case of potential retaliation.

When a Reported Matter is resolved, the person making the report will be informed by the person who receives the report that it has been resolved and it will be reinforced that the no retaliation against the person making the report will be tolerated.