

CS05 WHISTLE-BLOWING POLICY AND PROCEDURES

1. OBJECTIVES

This policy sets out by which employees may, in confidence, raise concerns about possible misdemeanors that he/she is aware of at their respective delegated workplace and/or work responsibility.

2. REVIEW

This policy is reviewed annually and updated in accordance with the needs of the Company.

3. INTRODUCTION

All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

This Policy is designed to:

- (a) support the Company's values;
- (b) ensure employees can raise concerns without fear of reprisals; and
- (c) provide a transparent and confidential process for dealing with concerns.

This policy not only covers possible improprieties in matters of financial reporting, but also:

- (i) fraud;
- (ii) corruption, bribery or blackmail;
- (iii) criminal offences;
- (iv) failure to comply with a legal or regulatory obligation;
- (v) miscarriage of justice;
- (vi) endangerment of an individual's health and safety; and
- (vii) concealment of any or a combination of the above.

4. PRINCIPLES

The principles underpinning this policy are as follows:

- (a) all concerns raised will be treated fairly and properly;
- (b) the Company will not tolerate harassment or victimisation of anyone raising a genuine concern;

- (c) any individual raising a concern is aware of who is handling the matter; and
- (d) the Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this assurance to someone who maliciously raise a matter he/she knows is untrue.

5. PROCEDURES

If any director, officer, employee, or Third Party believes reasonably and in good faith that bribery, corruption, gratification, or any acts in breach of the Anti-Bribery and Corruption (ABC) Policy exists in Opcom Group, the matter can be raised with the respective Business Unit Heads. However, if for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Integrity Committee (IC). Channel of reporting to the IC is as follows:

Name: Corporate Services Workgroup
Email: whistle-blowing@opcom.com.my (Mark "Strictly Confidential")
Tel: +603-5519 5599

In the case where reporting to management is a concern, then the report can be made to the Chairman of the Audit Committee ("AC"). Channel of reporting to the Chairman of the AC is as follows:

Name: Ms Lim Kim Lee
Email: limkimlee222@yahoo.com
Tel: +6016-2749438

6. ACTIONS

The person receiving the report shall update the Chairman and Opcom Management of the Company and investigate all reports promptly. The progress of investigation will be reported to the AC no later than the immediate next scheduled AC meeting. All report received will be treated as confidential.

The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as law permits it or the person making the report indicates that he/she no longer wishes to remain anonymous.

Upon completion of investigation, appropriate course of action will be recommended to the AC for their deliberation. Decision taken by the AC will be implemented immediately, if, within AC's authority. AC shall report the caused and action taken to the Board in the next immediate scheduled meeting.

Matters beyond AC's authority shall be reported directly to Board for deliberation and decision making.

Corporate Services Workgroup is responsible to safe keep and maintain all reported documents.