




3REN BERHAD

Registration No. 202101012445 (1412744-K)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

	3REN BERHAD Registration No. 202101012445 (1412744-K)	Doc. No:	3R-POL-007
		Rev. No:	00
	WHISTLEBLOWING POLICY	Eff. Date:	22 March 2024
		Page No:	Page 2 of 6

1. Objective

All employees of 3REN Berhad's ("3REN" or "the Company") and all its subsidiary companies within the Group ("3REN Group" or "the Group") are strongly encouraged to raise genuine concerns about any possible improprieties pertaining to financial reporting, compliance, malpractices and unethical business conduct within the Group at the earliest possible time and in an appropriate way.

This Whistleblowing Policy ("Policy") aims to instil confidence on and assure our employees that they will be protected from possible reprisals or victimization that if they raise concerns in good faith, and believing them to be true.

2. Scope and General Principles

2.1 The scope of matters covered by this Policy not only relates to concerns and complaints regarding financial matters but also the following (not exhaustive):


- a) Financial malpractice, impropriety or fraud;
- b) Corruption, bribery or blackmail;
- c) Failure to comply with laws or regulations or group/company policies and procedures;
- d) Criminal offences and miscarriage of justice;
- e) Endangerment of an individual's health and safety;
- f) Falsification or destruction of business or financial records, or misrepresentation or suppression of financial information; or
- g) Concealment of any or a combination of the above.

2.2 The general principles underpinning this Policy are as follows:

- a) All concerns raised will be treated fairly and properly.
- b) The Board of Directors ("Board") will not tolerate harassment or victimization of anyone raising a genuine concern.
- c) The Board will ensure no whistle-blower will be at risk of suffering some form of reprisal as a result of raising a concern even if he/she is mistaken. The Board, however, does not extend this assurance to anyone who maliciously raises a matter he/she knows is untrue or is acting for personal gain.
- d) The submission of a false or frivolous report may have consequences for whistle-blower and he/she may be liable for damages towards anyone who suffered from such false report. However, in the event that a complaint made in good faith is subsequently found to be untrue, no action would be initiated against the whistle-blower.
- e) The act of whistleblowing should not shield the whistle-blower from the reasonable consequences flowing from any involvement in improper conduct. The whistle-blower's liability for his/her own conduct is not affected by his/her disclosure of that conduct. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

3. Whistleblowing Procedures

3.1 If any employee believes reasonably and in good faith that suspected incident of improper conduct or malpractices exist within the Group, the employee should report this immediately to his immediate supervisor or management in writing and specifying:

	3REN BERHAD Registration No. 202101012445 (1412744-K)	Doc. No:	3R-POL-007
		Rev. No:	00
	WHISTLEBLOWING POLICY	Eff. Date:	22 March 2024
		Page No:	Page 3 of 6

- a) The whistle-blower's full name and contact details;
- b) Basis or reason for the whistle-blower concerns, for instances, its nature, the date, time, the occurrence place, and the identity of the alleged wrongdoer;
- c) Details of witnesses and all factual corroborating evidences as is available;
- d) Whether the whistle-blower has any personal interest in the matter; and
- e) Whether action has already been taken by anyone.

If the superior initially alerted is not competent to deal with the complaint, he/she should escalate, in strictest confidence, the relevant information and documents to higher management and inform the whistle-blower accordingly.

3.2 The management who receives the complaint shall maintain all complaints received, tracking their receipt, investigation and resolution. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.

3.3 The management may decide not to investigate a complaint if in its opinion the complaint:


- a) Is trivial; or
- b) Is frivolous or vexatious; or
- c) If the whistle-blower has had knowledge for more than 12 months of the disclosed matter and failed to give a satisfactory explanation for the delay in making the disclosure.

Should the management determine that a whistle-blower's report warrants an investigation, he/she or such other officer as may be identified will conduct an investigation with complete independence and confidentiality, in the shortest possible time given the resources are available.

3.4 The following principles shall be applied during investigations:

- a) Confidentiality of information and communications must be maintained.
- b) Issues must be addressed promptly.
- c) The investigation must locate and assess all evidence that either substantiates or refutes the complaint.
- d) Decisions should be made only on the basis of relevant evidence is available.
- e) All actions and the conduct of the investigation must be unbiased and must not draw conclusions until all the evidence has been collated and reviewed.
- f) Individuals who are suspected of having been involved with improper conduct should be informed of the issue as soon as practicable and be given the opportunity to provide explanations, details and responses to any allegations.

3.5 The whistle-blower will be informed of who is handling the matter, how he/she can make contact with the investigator and whether there is any further assistance required. The whistle-blower will receive update on the progress of the investigation and its outcome, unless this would be detrimental to the whistle-blower or the investigation, or unless there are other reasons not to inform the whistle-blower (such as the infringement of a duty of confidentiality owed by the Group to another party).

	3REN BERHAD Registration No. 202101012445 (1412744-K)	Doc. No:	3R-POL-007
		Rev. No:	00
	WHISTLEBLOWING POLICY	Eff. Date:	22 March 2024
		Page No:	Page 4 of 6

3.6 The investigator will be responsible for safeguarding all information received from a whistle-blower. The knowing unauthorized disclosure of whistle-blower's information or the identity of a whistle-blower by any employee may constitute misconduct for which, if established, disciplinary measures may be imposed.

3.7 The person who is being investigated by the Company shall:

- a) Be informed as to the substance of the allegations at the outset of an investigation;
- b) Be given the opportunity to respond to the allegations or material points of evidence contained in the investigation report, unless there are compelling reasons to the contrary;
- c) Be informed as to the substance of any adverse comment that may be included in any report arising from the investigation;
- d) Have his/her defence set out fairly in any report; and
- e) Be informed of the outcome of the investigation.

3.8 The whistle-blower may make a report to the Audit and Risk Management Committee ("ARMC") directly if:

- a) The above channels have been followed and the whistle-blower still has concerns;
- b) No action has been taken by the person initially alerted and all alternatives for internal consultation have been exhausted; or
- c) The use of the above reporting procedures is not appropriate in view of the circumstances or nature of the incidents (for instance, if there is a conflict of interest or a risk of reprisals, the intended recipient of the complaint is personally implicated in the incidents to be reported).


3.9 The ARMC may appoint an independent (internal or external) investigative officer at the expense of the Company to investigate and report to the ARMC:

- a) The allegation;
- b) All documents, statements or other exhibits received, and where any evidence has been rejected as being unreliable, the reasons for this opinion being formed;
- c) The conclusions reached and the basis for them;
- d) Any recommendations arising from the investigation; and
- e) Steps that need to be taken by the Group to prevent a recurrence in the future.

3.10 It should be noted that cases relating to suspected criminal activity, including but not limited to fraud, may be referred to the police at any stage of the investigation and will then be investigated by an external investigator.

3.11 All employees, directors and officers must fully cooperate with any investigation initiated under this Policy.

3.12 All employees, directors and officers must refrain from any activity that is, or could be perceived to be, victimization or harassment of a whistle-blower making a complaint in good faith. Any effort to retaliate against such whistle-blower will be reported immediately to the ARMC and appropriate disciplinary action will be taken.

	3REN BERHAD Registration No. 202101012445 (1412744-K)	Doc. No:	3R-POL-007
		Rev. No:	00
	WHISTLEBLOWING POLICY	Eff. Date:	22 March 2024
		Page No:	Page 5 of 6

3.13 Any attempt to cover up wrongdoing is a disciplinary offence. If the whistle-blower is told not to raise or pursue a complaint, even by a person in authority, he/she should report the matter to the ARMC.

3.14 Upon completion of an investigation, all documentation pertaining to the complaint including but not restricted to the investigation report, corrective action taken and evidence shall be maintained by the Human Resource Department (a.k.a. Talent and Culture Department).

4. Whistleblowing Channel

4.1 Reports under this Policy can be made through email or mail (using the form as per Annexure I).

4.2 For internal stakeholders (i.e., employees), reports can be addressed to the immediate superior or Head of Department. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Chief Executive Officer (“CEO”).

Channel of reporting to CEO is:

Name : Mr. Koh Dim Kuan
Mail : Mark *Strictly Confidential*
No. 9, Jalan Industri Tangkas 1,
Taman Industri Tangkas,
14000 Bukit Mertajam,
Pulau Pinang, Malaysia
Attention : CEO


In the case where reporting to management is a concern, then the report should be made to the Chairperson of ARMC.

Channel of reporting to the Chairperson of ARMC:

Name : Ms. Joyce Wong Ai May
Email : wb@3ren.com.my
Mail : Mark *Strictly Confidential*
No. 9, Jalan Industri Tangkas 1,
Taman Industri Tangkas,
14000 Bukit Mertajam,
Pulau Pinang, Malaysia
Attention : Chairperson – Audit and Risk Management Committee

4.3 For external stakeholders, reports can be addressed to the Company by email or by mail in a properly sealed envelope and indicated “Strictly Confidential” – To Be Opened by Addressee Only to the following address:

No. 9, Jalan Industri Tangkas 1,
Taman Industri Tangkas,
14000 Bukit Mertajam,
Pulau Pinang, Malaysia

	3REN BERHAD Registration No. 202101012445 (1412744-K)	Doc. No:	3R-POL-007
		Rev. No:	00
	WHISTLEBLOWING POLICY	Eff. Date:	22 March 2024
		Page No:	Page 6 of 6

In the case where reporting to the management is a concern, then the report should be made to the Chairperson of ARMC.

Channel of reporting to the Chairperson of ARMC:

Name : Ms. Joyce Wong Ai May

Email : wb@3ren.com.my

Mail : Mark ***Strictly Confidential***
No. 9, Jalan Industri Tangkas 1,
Taman Industri Tangkas,
14000 Bukit Mertajam,
Pulau Pinang, Malaysia

Attention : Chairperson – Audit and Risk Management Committee

4.4 The whistle-blower should be able to provide the disclosure in writing, information regarding the type of activity or conduct, identity of the person(s) suspected as being involved/ going to be involved, when it occurred/ going to occur and who was/ will be affected.

4.5 The whistle-blower is encouraged to identify himself/ herself and provide contact information in his/ her report. This will facilitate the investigator to obtain further information, if required and communicate results of investigation to the whistle-blower.

5. Confidentiality

5.1 All complaints received shall be kept confidential and will be shared only on a “need to know” basis.

5.2 The identity of a whistle-blower will not be disclosed without his/her prior consent. Where concerns cannot be resolved without revealing the identity of the whistle-blower (i.e., if the evidence is required in court), a dialogue will be carried out with the whistle-blower as to whether and how the matter can be pursued.

6. Revision of Policy

The management shall review and update this Policy periodically taking into consideration the needs of the Group as well as any new requirements in rules and regulations.

Any revision or amendment to this Policy, as proposed by the management shall be presented to the Board for its approval.

The Whistleblowing Policy has been reviewed and approved by the Board on 22 March 2024.

WHISTLEBLOWING FORM

	Date of report:
To:	
Incident date:	Incident time:
Location:	
Name of alleged person/ department: <i>(Detailed names and particulars of the person involved)</i>	
Detailed description of the alleged incident: <i>(Please include any attachment if necessary)</i>	
Violations: <i>(Please provide a list of any policies, procedures, or guidelines you believe have been violated in the event described)</i>	
Any witness: Yes / No; If yes, details of witness:	
Reported by:	

(Signature)	
Name:	
Employee No. (if any):	
Department/ Company:	
Contact no. or email:	