

WHISTLE-BLOWING POLICY

Policy Statement

CWG Holdings Berhad ("CWG" or "the Company") is committed to achieving and maintaining high standards of integrity and work ethics in the conduct of business in line with the Board Code of Conduct and good corporate governance practices.

CWG and its subsidiaries ("the Group") encourage its employees and stakeholders (amongst others, shareholders/suppliers/customers) to report genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal.

This policy is further enhanced with the Whistleblower Protection Act 2010 where a whistle-blower must be given proper protection against an employer while a complaint is being investigated.

Scope

The policy is applicable to the Board members, employees and other stakeholders of CWG group of Companies.

In this policy, "whistle-blowing" means the reporting by employees and stakeholders of suspected misconduct, illegal acts or failure to act within the regulatory requirements and/or the Board Code of Conduct.

Among others, the disclosures relating to, but not limited to, either of the following concerns or wrongdoings by any person in the conduct of the business shall be reported:-

- (a) Corruption, bribery and fraud;
- (b) Criminal offence or any breach of the laws of Malaysia;
- (c) Acceptance of gifts/ favour beyond the threshold allowed by the Group;
- (d) Misuse and/or misappropriation of the Group's fund or assets;
- (e) Impropriety (including financial and operational, etc.) within the Group;
- (f) Abuse of authority and/or gross mismanagement within the Group (including serious potential breach to the interest of society and environment);
- (g) Sexual harassment; and
- (h) Act or omission jeopardising the health and safety of the employees, stakeholders or the public

Grievance Procedure

1. If any individual reasonably believes in good faith that malpractice exists in the workplace, the individual should report to immediate superior. However, if it is not possible or appropriate to do so, the concern should then be reported to the Group Managing Director.
2. Upon receipt of the concern, the Group Managing Director shall set up an investigating team to conduct investigation on the concern raised. The progress of the investigation shall be reported to the Group Managing Director.
3. Upon completion of the investigation, the investigating team shall submit their full report together with recommendation to the Group Managing Director. Actions mandated shall be carried out accordingly.

4. If the individual is not satisfied with the way the concern/matter is dealt with, he/she can escalate the report to the Audit Committee Chairman.
5. The Audit Committee will deliberate the matter reported and decide on the appropriate action.
6. The individual who has raised concerns internally will be informed of who is handling the matter and how he can make contact with them for further assistance whenever required.
7. The individual's identity will not be disclosed without his prior consent. When concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in a court of law), a dialogue will be held with the employee concerned as to how the matter can be resolved.

Outcome

There will be no adverse consequences for anyone who reports a whistle-blowing concern in good faith. However, any individual found responsible for making allegations maliciously or in bad faith may be subject to disciplinary action.

The following actions may be taken after investigations into such a case have been completed:-

- (a) Disciplinary action (up to and including dismissal) against the wrongdoer dependant on the results of the investigation; or
- (b) Disciplinary action (up to and including dismissal) against the whistle-blower if the claim is found to be malicious or in bad faith; or
- (c) No action to be taken if the allegation proves to be unfounded.

Protection

A whistle-blower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable.

In addition, an employee who whistle-blows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistle-blower is mistaken as to the facts and the rules and procedures involved.

Communication Channels

Reports or disclosures under this policy can be made by through email or mail addressed to the respective levels as below:-

i) Group Managing Director

Name : Mr. Tan Hing Ming
Email : hmtan@campap.com
Mailing Address : To mark "Strictly Confidential"

Group Managing Director
CWG Holdings Berhad
6428, Lorong Mak Mandin Tiga
Mak Mandin Industrial Estate
13400 Butterworth, Penang
Malaysia

ii) Chairman of Audit Committee

Name : Mr. Loh Seong Yew
Email : lohysl@gmail.com
Mailing Address : To mark "Strictly Confidential"

Chairman of Audit Committee
CWG Holdings Berhad
6428, Lorong Mak Mandin Tiga
Mak Mandin Industrial Estate
13400 Butterworth, Penang
Malaysia