

ANALABS RESOURCES BERHAD

WHISTLE BLOWING POLICY

1. Introduction

This whistleblowing policy and procedure is to provide an opportunity for concerns raised by employees, directors and others to be investigated and for appropriate action to be taken to ensure that the matter is resolved effectively and within the Company wherever possible.

This policy shall apply to all employees of the Company and the Group.

2. Assurance

The Board are committed to this policy. If employees raise a genuine concern under this policy, they will not be at risk of losing their job or suffer any form of victimization. Provided they are acting in good faith, reasonably believe that information, and any allegations contained in it, are substantially true and they are not acting for personal gain. The Company does not extend this assurance to someone who maliciously raises a matter they know are untrue. The Company will not tolerate the harassment or victimization of anyone raising a genuine concern, however the Company recognize that an employee may nonetheless want to raise a concern in confidence under this policy. The Company will protect the identity and will not disclose it without the employee consent.

3. Objective

The objective of the policy and procedure is to provide and facilitate a mechanism for any whistleblower to report concern about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse which may include the following examples of issues:

- (i) Commission of fraud and/or corruption and/or dishonesty
- (ii) Unauthorised use of Company/Group's money, properties and/or facilities
- (iii) Failure to comply with appropriate professional standards
- (iv) Disclosure of Company's and/or Group's information without proper authorisation
- (v) Discrimination, intimidation, harassment and/or victimising any members of the Board, Management or staff of the Company/Group
- (vi) Abuse of power, or the use of power and authority for any unauthorised purpose
- (vii) Sexual or physical abuse of any member of staff
- (viii) Involvement in conflict of interest and/or business opportunities position
- (ix) Any other matter, which cannot be raised by any other procedures

4. Anonymous Reporting

The whistleblower may identify himself or if he prefers, to remain anonymous when reporting suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse.

5. Confidentiality

The identity of the whistleblower and all concerns raised would be treated as confidential in order to protect the whistleblower. However, the whistleblower may be required to come forward as a witness in accordance with any applicable laws and/or regulations.

Any employee reporting on any concern must make it in good faith with reasonable belief that it is true, without malicious or false allegation and not for personal gain. Any employee found to make false and malicious allegation shall be subjected to disciplinary and/or legal actions by the Company.

6. Procedure

- a) Any concern should be reported to the immediate superior by completing the whistle blowing reporting form as per Appendix I. However, if it is not possible or appropriate, the concern should then be reported to the Group Executive Chairman or Senior Independent Non-Executive Director (SINED). Mr Low Chin Ann @ Han Chin Ann has been appointed as the SINED and the concern can be emailed to him at wbp@analabs.com.my.
- b) Upon receipt of the concern, the Group Executive Chairman or SINED (depending on who is the recipient of the reporting) shall conduct an investigation on the issue/concern raised.
- c) The progress of the investigation and full report together with the recommendation shall be submitted to the Group Executive Chairman or SINED.

WHISTLE BLOWING REPORTING FORM

Part A: To be completed by individual raising a concern

1. Details of Whistle Blower

Name : _____

Contact No. & email : _____

2. Issue Raised

Nature of the Concerns:

Background, Date and History of the Concerns:

Identity of the Person Engaged in Improper Conduct:

Reasons for the Concerns

Details of Evidence and Witnesses:

Whether Action Has Already Been Taken and By Whom:

Whether Whistle Blower Has Any Personal Interest in the Matter Reported:

Submitted by

Received by

Name:

Date: _____

Time: _____

Part B: To be completed by Investigator/Investigating Officer

3. Additional Information

4. Investigation of Concern /Steps Taken to Address the Concern

5. Findings

6. Recommendations

7. Preventive Measures to be Taken

Prepared by

Name:

Date:

Time: