



ASTRAL ASIA BERHAD

Registration No. 199601002254 (374600-X)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

Introduction

In line with good corporate governance practices and with the introduction of the Whistleblower Protection Act 2010, the Board and Management of Astral Asia Berhad ("AAB" or the "Company") and its Group of Companies ("AAB Group" or the "Group") encourage its employees and other interested parties ("RI") to report suspected and/or known misconduct wrongdoings, corruption and instances of fraud, waste, and/or abuse involving the resources of the Company.

Objectives

The objective of this policy and procedure is to provide and facilitate a mechanism for any RI to report concerns about any suspected and/or known misconduct, wrongdoings, corruption, fraud, waste and/or abuse.

Policy & Protection

1. Anonymity

It is the policy of the Company to allow the RI to either identify themselves or if they prefer, to remain anonymous when reporting suspected and/or known instances of misconduct, wrongdoings, corruption, fraud, waste and/or abuse.

2. Assurance against reprisal and/or retaliation

Where the RI has chosen to reveal his/her identity, it is the policy of the Company to provide assurance that the RI would be protected against reprisals and/or retaliation from his/her immediate superior or head of department / division.

In addition, the Company provides assurance that no disciplinary action can be taken against the RI as long as he/she does not provide false information in the report "purposely, knowingly or recklessly", i.e. the report is basically malicious in nature.

3. Confidentiality

The Company shall treat all reports or disclosures as sensitive and will only reveal information on a “need to know” basis or if required by law, court or authority.

The identity and particulars of the RI shall also be kept private and confidential unless the RI chose to reveal his/her identity.

Where the RI has chosen to reveal his/her identity when making such a report, written permission from the RI would be obtained before the information is released.

4. Immunity

All costs in relation to any legal liabilities or proceedings (whether criminal or civil) that may be brought against the RI shall be borne by the Company and the selection of the lawyer defending the legal action shall be made by the Company.

5. Protection

The RI shall also be protected against:-

- action causing injury, loss or damage;
- intimidation or harassment;
- interference with the lawful employment or livelihood of the RI, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the RI's employment, career, profession, trade or business or the taking of disciplinary action; and
- a threat to take any of the actions referred to in paragraphs (i) to (iii) above.

Procedure for Reporting Improper Conduct, Wrongdoings, Corruption, Fraud, Waste and/or Abuse

If a RI suspects that improper conduct, wrongdoings, corruption, fraud, waste or abuse has occurred, the RI is encouraged to inform the Audit Committee.

This can be done in writing, by fax, post or e-mail. The disclosure should be addressed to:-

Chairman of the Audit Committee

Level 12, Menara TSR
No. 12, Jalan PJU 7/3
Mutiarra Damansara
47810 Petaling Jaya
Selangor Darul Ehsan

Fax : 03-7717 5599

E-mail: enquiry@astralasia.com

The RI may also lodge a report with the police, Malaysian Anti Corruption Agency or any other enforcement agency as defined under the Whistleblower Protection Act 2010 and forward a copy of the said report to the Company to enable the Company to conduct its own internal investigations.