

WHISTLE BLOWING POLICY

1. POLICY STATEMENT

TL Giam Adjusters Sdn Bhd (the Company) is committed to conducting its business with honesty and integrity at all times. In line with this commitment, the Whistle Blowing Policy (the "Policy") aims to provide an avenue for employees and external parties to raise concerns and offer reassurance that they will be protected from reprisals or victimization for whistle blowing in good faith.

2. OBJECTIVE OF THIS POLICY

- Deter wrongdoing and to promote standards of good corporate practices.
- Provision of proper avenues for the person who has reasonable grounds to believe that an employee, manager or any other person related to the Company has committed, or is about to commit, an offence that could harm the Company's business and reputation, denounces the wrongdoer in question.
- Give employees the assurance that they will be protected from reprisals or victimization for whistle blowing in good faith.
- If at any time this commitment is not respected or appears to be in question, the Company will endeavour to identify and rectify such situations

3. REPORTABLE INCIDENTS

- Breach of the Company's Code of Ethics
- Failure to comply with guidelines on Adjusters' Duties and Obligations Towards Claimants, Clients, Insurers, Representatives and public
- Concerns about the Company accounting, internal controls or auditing matters
- Conduct which is an offence or breach of law
- Serious conflict of interest without disclosure
- Any other serious improper matters which may cause financial or non-financial loss to the Company, or damage to the Company's reputation

4. PROTECTION AGAINST REPRISALS

If an employee raises a genuine concern under this Policy, he or she will not be at risk of losing his or her job or suffering from retribution or harassment as a result. Provided that the employee is acting in good faith, it does not matter if he or she is mistaken. However, the Company does not condone frivolous, mischievous or malicious allegations. Employee(s) making such allegations will face disciplinary action in accordance with the Company disciplinary procedures.

5. CONFIDENTIALITY

The Company encourages the whistleblower to identify himself/herself when raising a concern or providing information. All concerns will be treated with strict confidentiality.

Exceptional circumstances which information provided by the whistleblower could or would not be treated with strict confidentiality:-

- Where the Company is under legal obligation to disclose information provided;
- Where the information is already in the public domain; • Where the information is given on a strictly confidential basis to legal or auditing professional for the purpose of obtaining professional advice;

- In the event the Company is faced with circumstance not covered by the above, and where the whistleblower's identity is to be revealed, the Company will endeavour to discuss this with the whistleblower first

6. CONCERN AND INFORMATION PROVIDED ANONYMOUSLY

Concerns expressed anonymously are much less persuasive and may hinder investigation work as it is more difficult to look into the matter or to protect the whistleblower's position. Accordingly, the Company will consider anonymous reports, but concerns expressed or information provided anonymously will be investigated on the basis of their merits

7. HOW TO RAISE A CONCERN OR PROVIDE INFORMATION

All reports are encouraged to be made in writing, so as to assume a clear understanding of the issues raised. All reports should be sent through e-mail directly to the Company's Chief Executive Officer at darryl@tlga.com.my with the subject marked as "Whistleblower" for ease of identification.

8. INFORMATION POINTS TO NOTE WHEN RAISING A CONCERN OR PROVIDING INFORMATION

The earlier the concern is raised, the earlier it is for the Company to take action. The Company expects the whistleblower to provide his or her concern in good faith and to show to the appropriate officer that there are sufficient grounds for his or her concern

9. HOW THE COMPANY WILL RESPOND

The Company assures that any concern raised or information provided will be investigated, but consideration will be given to the following factors:

- Severity of the issue raised
- Credibility of the concern or information
- Likelihood of confirming the concern or information from attributable sources

The amount of contact between the whistleblower and the person(s) investigating the concern raised and information provided will be determined by the nature and clarity of the matter reported. Further information provided may be sought from the whistleblower during the course of investigation.

10. INVESTIGATING ALLEGED MISCONDUCT OR IMPROPER ACTIVITIES

On receipt of a report on misconduct or improper activities, the Chief Executive Officer will appoint an Investigating Officer responsible for conducting investigation. The Investigating Officer will:-

- Notify the sender and acknowledge receipt of the reported violation or suspected violation within ten business days.
- Shall meet to discuss about the action/ investigation on the reports receives from the whistleblowers.
- May also exclude from its meetings any person it deems appropriate, depending on the nature of the complaint.
- Will ensure investigations are carried out using appropriate channels, resources and expertise.
- May be resolve concern by agreed action without the need for an investigation.
- Will report to the Management on a periodic basis about the reports received and actions taken.
- The Management reserves the right to make any decision based on the findings by the Investigating Officer