

WHISTLE BLOWING POLICY

1. INTRODUCTION

- 1.1. Pulai Mining Sdn. Bhd. (the “Company”) is committed to a high standard of compliance with accounting, financial reporting, internal controls, corporate governance and auditing requirements, and any legislation relating thereto. 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.
- 1.2. The Policy is intended to conform to the guidance set out in the Malaysian Code on Corporate Governance which encourages employees to raise concerns, in confidence, about possible irregularities.

2. WHO IS COVERED BY THIS POLICY

- 2.1. This Policy applies to all employees of the Company.

3. OBJECTIVE OF THIS POLICY

- 3.1. Deter wrongdoing and to promote standards of good corporate practices.
- 3.2. Provision of proper avenues for employees to raise concerns about or suspected improprieties in matters of financial reporting or other matters and receive feedback on any action taken.
- 3.3. Give employees the assurance that they will be protected from reprisals or victimization for whistle blowing in good faith.

4. REPORTABLE INCIDENTS

- 4.1. Some examples of concerns covered by this Policy include (this list is not exhaustive):

- Concerns about the Company accounting, internal controls or auditing matters;
- Breach of failure to implement or comply with the Company policies or code of conduct;
- Impropriety, corruption, acts of fraud, theft and misuse of the Company properties, assets or resources;
- Conduct which is an offence or breach of law;
- Abuse of power of authority;
- Serious conflict of interest without disclosure;
- International provision of incorrect information to public bodies;
- Any other serious improper matters which may cause financial or non-financial loss to the Company, or damage to the Company's reputation;
- Fraud against investors, or making of fraudulent statements to the members of the investing public and government or state.
- Acts to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external accountant or auditor in connection with the preparation examination, audit or review of any financial statements or records of the Company;
- Concealing information about any malpractice or misconduct.

4.2. The above list is intended to give an indication of the kind of conduct which might be considered as "wrong-doing". In cases of doubt, the whistleblower should seek to speak to his or her immediate superior or follow the procedure for reporting under this Policy.

5. PROTECTION AGAINST REPRISALS

5.1. 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.

5.2. 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.

6. CONFIDENTIALITY

- 6.1. The Company encourages the whistleblower to identify himself/herself when raising a concern or providing information. All concerns will be treated with strict confidentiality.
- 6.2. Exceptional circumstances which information provided by the whistleblower could or would not be treated with strict confidentiality include: -
- 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;
 - Where the information is given to the Police or other authorities for criminal investigation.
- 6.3. 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.

7. CONCERN AND INFORMATION PROVIDED ANONYMOUSLY

- 7.1. 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.

8. HOW TO RAISE A CONCERN OR PROVIDE INFORMATION

- 8.1. 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 directly to: pauljerry323@gmail.com ("the Investigating Officer")
- 8.2. All reports sent through e-mail is recommended to mark the subject as "Whistleblower" for ease of identification.

8.3. Although the whistleblower is not expected to prove the truth of an allegation, he or she needs to demonstrate to the person contacted there are sufficient grounds for concern.

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

9.1. The earlier the concern is raised the earlier it is for the Company to take action.

9.2. 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 concerns.

10. HOW THE COMPANY WILL RESPOND

10.1. 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

10.2. 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.

10.3. The Investigating Officer will communicate the finding of the investigation(s) to the Management for their necessary action.

11. INVESTIGATING ALLEGED MISCONDUCT OR IMPROPER ACTIVITIES

11.1. The Investigating Officer who receives a report will notify the sender and acknowledge receipt of the reported violation or suspected violation within ten business days.

- 11.2. The Investigating Officer shall meet to discuss about the action/ investigation on the reports receives from the whistleblowers. The Investigating officer may also exclude from its meetings any person it deems appropriate, depending on the nature of the complaint.
- 11.3. The Investigating Officer has the responsibility to conduct investigation. In addition, other parties may also be involved in the investigation.
- 11.4. The Investigating Officer will ensure investigations are carried out using appropriate channels, resources and expertise.
- 11.5. Some concerns may be resolved by agreed action without the need for an investigation. Concerns about allegations which fall within the scope of specific procedures will be referred for consideration under those procedures.
- 11.6. The Investigating Officer will report to the Management on a periodic basis about the reports received and actions taken.
- 11.7. The Management reserves the right to make any decision based on the findings by the Investigating Officer.