



WHISTLEBLOWING POLICY

1 INTRODUCTION

QES Group Berhad (“the Company”) and its subsidiaries (“the Group”) are committed to the highest standard of corporate governance and business integrity.

In recognizing the abovementioned values, the Company provides an avenue for all the employees of the Group and members of the public to raise concerns or disclose any improper conduct within the Group and to take appropriate action to resolve them effectively.

2 OBJECTIVE

The intended objectives of this policy are:

- i. To encourage and develop a culture of openness, accountability and integrity.
- ii. To provide avenues for employees to raise genuine concerns or allegation through the appropriate channels upon discovery of possible misconduct.
- iii. To ensure protection of the individual who reports the concern or allegation in good faith and in accordance with the procedures.
- iv. To enable management to be informed at an early stage about acts of misconduct.

3 ACTING IN GOOD FAITH

The Group expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it, are substantially true and not acting for personal gain. Anonymous whistleblower will not be entertained. However, the Group reserves its right to investigate into any anonymous disclosure. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

4 **SCOPE OF THE POLICY**

This policy is designed to facilitate the whistleblower to report or disclose through established channels, concerns about any violations of the Code of Ethics and Conduct of the Group, including, but not limited to fraud, bribery, sexual harassment, criminal breach of trust, conflict of interest, misuse of confidential information or other acts of wrong doing.

5 **CONFIDENTIALITY**

The identity of whistleblower will be kept confidential. Consent of whistleblower will be sought should there be a need to disclose identity for investigation purposes.

6 **PROTECTION**

The Group assures the whistleblower who raises issues of concern that he/she will be protected from any adverse impact on his/her employment or relationship with the Group as a result of his/her reporting, provided the report is made in good faith and without malice. Any party that retaliates against whistleblower who has reported allegations in good faith may be subject to appropriate action, up to and including legal action, where applicable.

7 **ACTION**

All reports will be investigated promptly by the person receiving the report or disclosure. If required, assistance from other resources within the Group can be sought. Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee of the Company for their deliberation. Decision taken by the Audit Committee of the Company will be implemented immediately. Where possible, steps will also be implemented to prevent similar situation arising.

8 **REVERTING TO COMPLAINANT**

The Group reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owned to someone else.

9 **WHISTLEBLOWING CHANNEL**

The established channels for whistleblowing reporting are as follows:

- a) Any concern should be raised with the immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Managing Director of the Company (“MD”). The channel of reporting to the MD is as follows:

By Mail: **Strictly Confidential**
QES Group Berhad
(Registered office) Lot
4.100, 4th Floor, Wisma
Central, Jalan Ampang,
50450,
Kuala Lumpur
Attention: The Managing Director

- b) If for any reason, it is believed that reporting to management is a concern or not possible or appropriate, then the concern should be reported to the Chairman of Audit Committee of the Company. The channel of reporting to the Audit Committee Chairman is as follows:

By Mail: **Strictly Confidential**
QES Group Berhad
(Registered office) Lot
4.100, 4th Floor, Wisma
Central, Jalan Ampang,
50450,
Kuala Lumpur
Attention: The Audit Committee Chairman

10 **DISCLAIMER**

QES reserves the right to amend this policy from time to time.