

JADI IMAGING HOLDINGS BERHAD (200001023711) (526319-P)

WHISTLEBLOWING POLICY

1. Introduction

The Board, the Management and Employees of Jadi Imaging Holdings Berhad (“Jadi” or the “Company”) as well as its subsidiaries (collectively referred to as the “Group”) are committed to upholding and applying the highest standards of ethics and best governance practices in all business decisions and throughout the Group’s operations. This Whistleblowing Policy (“the Policy”) establishes the Company’s position in encouraging employees and stakeholders to report any malpractices or misconducts which they are aware of, and to ensure that employees and stakeholders who report such malpractices or misconducts are protected from any form of retaliation.

2. Objective

The Whistleblowing policy shall provide an official avenue to encourage employees and stakeholders to make a report to the Management or the Board of Directors, whichever is applicable, on any forms of workplace misconduct, misappropriation or abuse of company property, harassment and dangerous acts which compromises safety and the environment in the spirit of good faith.

A) By implementing Whistleblowing policy among employees, this policy is aimed at:

- 1) instilling better stewardship, greater workplace discipline and responsibility among employees;
- 2) improving overall company productivity across various departments and at all levels of operations; and
- 3) raising greater awareness on the need to maintain good environmental, safety and health practices at the workplace.

B) By implementing Whistleblowing policy for all its stakeholders including contractors and suppliers, this policy is aimed at:

- 1) providing an avenue that encourages the reporting of abuse and unethical business conducts while transacting with any employees of Jadi; and
- 2) promoting fair and ethical trade that is mutually beneficial to the long term business and relationship of both Jadi and its worldwide business partners.

Definition of abuse and unethical business conducts may include, but not limited to:

- 1) open and direct request for monetary kickbacks in the form of commission and/or percentage return from the total sum of Jadi’s purchases.
- 2) resorting to unreasonable demands, dishonesty, trickery and deception to coerce a supplier into providing monetary and/or non-monetary inducements; and
- 3) accepting indirect incentives such as free gifts and redemption vouchers for personal use, that comes along with the purchases made by Jadi.

We urge all our business partners to come forward, and make a report should they have any information of abuse, or if they know of or have encountered any incidents of unethical business conducts when dealing with any employees of Jadi.

3. Scope

Please be advised that this policy is applicable to all stakeholders which may include but not limited to suppliers, customers, any other parties who have dealings with any of the company's employees, as well as employees within the company from various levels including non-executive foreign personnel within the company's Principal Office, Local and Overseas Subsidiaries.

4. Procedures

A) Any incidence as defined under the scope of this policy should be made directly to an immediate superior in the case of the report being lodged by the company's employee. On the other hand, reporting by any other stakeholders can be made directly to a staff member who can then convey such report to the Senior Management. If for any reason, it is believed that these reporting options are not feasible or appropriate, then the concern should be reported directly to the Senior Management and/or Executive Directors as listed below:

Mr. Desmond Ong
Executive Director
Email: desmond@jadi.com.my
Mobile: +6012-3728829

Ms. Elaine Chan
Finance Manager
Email: elainechan_accts@jadi.com.my
Mobile: +6012-6503338

En. Khairul Akmar
Human Resource Manager
Email: akmar_hr@jadi.com.my
Mobile: +6010-9858957

B) In the case where reporting to the management is a concern, then the report should be made to the Chairman of Audit Committee (“AC”). Channel of reporting to the Chairman of AC is:

Mr. Leow Wey Seng
Chairman of AC
Email : whistleblower.jadi@gmail.com
Mobile : +603-78040333

C) Please be advised that any employees or stakeholders who wish to disclose an unethical business practice or misconduct must be well-intentioned, be willing to make known their own identity, must be contactable, and must be willing to be present to assist with any investigation when requested to do so. The Board of Directors and Senior Management would like to assure that well-intentioned employees and stakeholders will not be subjected to any forms of prejudice or penalty for their actions, and that any reports received will be handled and investigated with strict confidentiality to protect the anonymity of the discloser.

5. Action

- (a) We urge all employees and stakeholders who have information pertaining to any of the above listed misconducts by other employees, to come forward and make a report in full confidence. All reports will be investigated promptly by the person receiving the report who should promptly report to the management, if appropriate.
- (b) All reports received from employees and stakeholders will be handled with strict confidentiality at all times.
- (c) The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Notwithstanding this, anonymity will be maintained as long as it is permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
- (d) Where possible, steps will be taken to prevent similar situation from arising again.

6. Review of the Policy

The Board shall monitor compliance with the Policy and regular reviews to ensure that the Policy remains relevant and appropriate.

7. Exceptions

Any exception of the Policy is reserved for decision by the Board or any of its appropriate Committee, and shall be granted on a case-by-case basis and only under extraordinary circumstances.