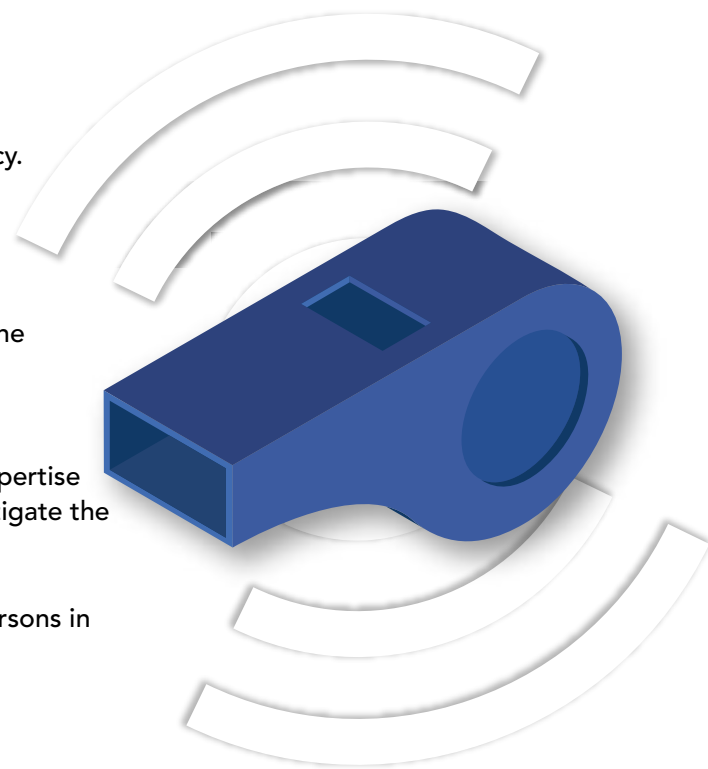


WHISTLEBLOWING

Johor Corporation and its Group of Companies are committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner. Recognising the above mentioned values, JCorp provides avenues for all employees of JCorp and members of the public to disclose any improper conduct within JCorp

OBJECTIVES OF THE POLICY

1. To outline the processes for managing the overall implementation of a Whistleblowing Policy.
2. This Policy provides a formal avenue for any person to disclose in good faith any Improper Conduct by the JCorp's employees.
3. This Policy outline the protection to any person who report Improper Conduct, subject to the conditions specified in item 7.3, being fulfilled.
4. This Policy also ensures that all disclosures with merits will be investigated promptly and objectively by competent, independent, unbiased and ethical individuals. If the required expertise is not available within JCorp, external experts will be engaged at JCorp's expense to investigate the matter and provide a report.
5. To ensure disciplinary, remedial and/ or legal action (where appropriate) is taken against persons in JCorp who are responsible for wrongdoings, and against third parties, where possible.



SCOPES OF THE POLICY

1. This Policy is applicable to any person who discloses any Improper Conduct to the Group Integrity Unit ('GIU') in good faith.
2. This Policy applies to JCorp's directors and employees, including permanent employees, contracted employees, temporary employees, gig workers and employees on secondment basis.
3. An Improper Conduct Report may be made by a director, employee or external party who has knowledge of, or genuinely suspects, on a reasonable belief that a director or an employee of JCorp has engaged, is engaging or is preparing to engage in any Improper Conduct.
4. Any provision in a contract of employment that attempts to prevent the disclosure of Improper Conduct shall be considered void to the extent that it seeks to obstruct such disclosure or contravenes the other provisions of this Policy.
5. To facilitate a due and fair investigation process, any person who discovers or suspects any Improper Conduct within JCorp, should not attempt to conduct investigations personally or interrogate any suspect.

MISCONDUCT

Any act that violates JCorp's Employee Code of Conduct and Business Ethics (COBCE), Policies and Circulars including minor and major misconduct and any criminal acts under any written laws.

ANONYMOUS DISCLOSURE

1. While anonymous disclosure is allowable, this Policy encourages Whistleblowers to disclose their identity to facilitate the investigations.
2. Anonymous whistleblowing is permitted but the investigation shall be limited to the content of the report.
3. GIU reserves its right to act and decide on any anonymous disclosure. However, no protection either through the Policy or the act will be accorded for such a disclosure.

PROTECTION TO THE WHISTLEBLOWER

1. JCorp guarantees that no adverse or detrimental action can be taken by any person within JCorp against the Whistleblower who made the disclosure in good faith subject to the conditions fulfilled in item 3.
2. The business associates of JCorp and members of the public who become a Whistleblower will also be protected by the Company as to her/his identity and disclosure subject to the conditions fulfilled in item 3.
3. Protection to the Whistleblower limited to this Policy will be provided by JCorp only when the Whistleblower satisfies all of the following conditions:-
 - The disclosure is done in good faith, is not frivolous or vexatious or is not made with malicious intent or ulterior motives;
 - The Whistleblower has disclosed his/her identity and contact details;
 - The Whistleblower has not communicated the disclosure to any party other than CIO, Chairman of WBC or Deputy Chairman of the BOD; and
 - The disclosure made is not for personal gain or interest.
4. The identity, confidential information and disclosure of the Whistleblower and alleged wrongdoer may only be revealed to the persons involved in the investigation process.
5. Detrimental action includes:-
 - Demotion, termination of employment or forced resignation;
 - Any action of harassment, intimidation or discrimination against the Whistleblower;
 - A threat to take any of the actions above (a) and/or (b) against the Whistleblower.

If the Whistleblower is threatened or physically assaulted either by the alleged person or hired individuals subsequent to the disclosure, the Whistleblower shall immediately report the incident to the Royal Malaysian Police for further action.

If the Whistleblower requires protection other than those specified in this Policy, the Whistleblower shall communicate his/her intention to Group Integrity Unit (GIU) who will facilitate the disclosure to the enforcement agency, and the Whistleblower shall be protected under the Whistleblower Protection Act 2010.

ALL DISCLOSURE SHALL BE MADE THROUGH WHISTLEBLOWING CHANNELS



whistleblowing@jcorp.com.my

This email can only be accessed by
the Chairman of WBC and CIO)



Chairman of WBC/Deputy Chairman of the BOD
Group Integrity Unit
Level 7, Menara KOMTAR,
Johor Bahru City Centre,
80000 Johor Bahru

(Sealed and marked 'Strictly Confidential')

We aspire to achieve the highest standards of integrity in the conduct of our business and operations.

If you know or are aware of any improper conduct (misconduct or criminal offence) committed or about to be committed within the JCorp Group of Companies, report it to us by providing the required information.