

AFA GROUP WHISTLEBLOWING POLICY



Introduction

AFA Infrastructure and Development Sdn Bhd ("AFA" or "the Company") and its subsidiary companies (collectively referred to as "AFA Group") are committed to upholding the highest standards of integrity, transparency, accountability and ethical conduct in all aspects of its business operations and corporate dealings.

In line with good corporate governance practices, this Whistleblowing Policy ("Policy") provides an avenue for employees, directors, business associates and stakeholders to disclose, in good faith, any actual or suspected improper conduct, misconduct, unethical behaviour, corruption, fraud or other wrongdoing involving AFA Group.

AFA Group is committed to ensuring that all reports made in good faith are treated seriously, fairly and confidentially, and that whistleblowers are protected against retaliation, victimisation or any form of detrimental treatment.

Who Can Make a Report

The following persons may make a whistleblowing report under this Policy:

- Employees (including permanent, contract, temporary and seconded employees);
- Directors and Management;
- Former employees;
- Customers;
- Shareholders and financiers;
- Vendors, contractors, suppliers, consultants and service providers; and
- Any external party with genuine concerns relating to AFA Group's business conduct or operations.

Reportable Concerns

Whistleblowing reports may include, but are not limited to, concerns relating to the following:

- Fraud, theft or embezzlement;
- Bribery, corruption or abuse of power;
- Criminal breach of trust;
- Financial misconduct or irregularities;
- Misuse or misappropriation of company assets or funds;
- Conflict of interest;
- Breach of laws, regulations, internal policies or procedures;
- Gross negligence, misconduct or malpractice;
- Harassment, including sexual harassment;
- Improper discrimination;
- Health, safety or environmental violations;
- Actions that may adversely affect the interests, reputation or operations of AFA Group; and
- Any act intended to conceal any of the above misconducts or wrongdoings.

Confidentiality and Protection

All whistleblowing reports will be treated with strict confidentiality to the extent reasonably practicable and consistent with the need to conduct a proper and fair investigation.

AFA Group strictly prohibits retaliation, harassment, victimisation or any adverse action against any individual who raises a concern in good faith under this Policy.

However, any individual who knowingly makes a false, malicious or frivolous report may be subject to appropriate disciplinary or legal action.

Any personal data collected pursuant to this Policy shall be processed in accordance with applicable personal data protection laws and regulations.

Good Faith Reporting

Whistleblowers are expected to act honestly, responsibly and in good faith when making a report under this Policy.

A whistleblower is not required to prove the truth of an allegation but must have reasonable grounds to believe that the information disclosed indicates actual or suspected wrongdoing, misconduct or improper conduct.

Review of Policy

AFA Group reserves the right to review, amend and update this Policy from time to time to ensure its continued effectiveness, relevance and compliance with applicable laws, regulations and corporate governance practices.

Reporting Channels

Whistleblowing reports may be submitted through the following channels:



WeCare Portal
4uwecare.com



Email
whistle@4uwecare.com



Hotline
+1700 81 5333
(Monday to Friday, 9.00 a.m. to 5.30 p.m.,
excluding public holidays)



By Mail
Whistleblowing Hotline Consultant
c/o Axcelasia Roots Sdn Bhd, PO Box 10891
50740 Kuala Lumpur