

# WHISTLEBLOWING POLICY

## 1. INTRODUCTION

NOVA WELLNESS GROUP BERHAD and its subsidiaries (the “Group”) are committed to the highest standard of corporate governance and business integrity. The Group aspires to conduct its affairs in an ethical, responsible and transparent manner which is vital to the success of the Group. In recognising the abovementioned values, the Group provides avenue for all 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 without fear of victimisation and/or subsequent discrimination.

## 2. OBJECTIVES

The intended objectives of this policy are:

- To encourage and develop a culture of openness, accountability and integrity.
- To provide avenues for employees and members of the public to raise genuine concerns or allegation through the appropriate channels upon discovery of possible misconduct.
- To ensure the protection to individual who reports the concern or allegation in good faith in accordance with the procedures.
- 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 sustainably true and not acting for personal gain. Any 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 whistle blower 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, theft, bribery, sexual harassment, criminal breach of trust, conflict of interest, abuse of position, profiteering as a result of insider knowledge, questionable and improper accounting, breach of policies, misuse of confidential information or other acts of wrong doing.

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## 5. CONFIDENTIALITY

All whistle-blowing reports are treated as utmost confidential and or anonymous and not to reveal the whistle-blower's identity, to the extent permitted by law. The whistle-blower is to be given an assurance that his/her identity will be only known by a few top managements on a need to know basis and for investigation purpose. 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 their 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.

If a whistle-blower reasonably believes that he/she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he/she may consult or report to the immediate superior or head of department or through the person to contact as stated in the *WHISTLE BLOWING CHANNEL*.

## 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 ("AC") for their deliberation. Decision taken by the AC 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 owed to someone else.

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## 9. WHISTLE BLOWING CHANNEL

The established channels for whistle blowing reporting are as follows:

Any concern should be raised with the immediate superior or head of department. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported directly to:

### A) For matters requiring the attention of Executive Management

**Name** : Phang Nye Lin  
**Via Email** : [whistleblowerEM@nova.com.my](mailto:whistleblowerEM@nova.com.my)  
**Via Mail:** (*mark, 'Strictly Confidential to be opened by Addressee only'*)  
 Nova Wellness Group Berhad  
 Lot 708, Nova Avenue,  
 4<sup>th</sup> Mile, 43950 Sungai Pelek,  
 Selangor, Malaysia  
**Attention** : **Managing Director**

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 (AC). The channel of reporting to the AC Chairman is as follows:

### B) For matters requiring the attention of Non-Executive Management

**Name** : Sim Seng Loong @ Tai Seng  
**Via Email** : [whistleblowerNEM@nova.com.my](mailto:whistleblowerNEM@nova.com.my)  
**Via Mail:** (*mark, 'Strictly Confidential to be opened by Addressee only'*)  
 Nova Wellness Group Berhad  
 Lot 708, Nova Avenue,  
 4<sup>th</sup> Mile, 43950 Sungai Pelek,  
 Selangor, Malaysia  
**Attention** : **The Audit Committee Chairman**

The report shall contain the following information:

- Types of misconduct or wrongdoings
- Name of person/persons involved
- Time, location and dates of misconduct or wrongdoings occurred
- How the misconduct or wrongdoings were conducted
- Other witness to the misconduct or wrongdoings
- Documentation or evidence available

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All reports received will be analysed and discussed with the Whistle Blowing Committee to decide on the next appropriate course of action. In consequence of the investigation, the outcome will be tabled in the Audit Committee Meeting. The Audit Committee or the Managing Director shall then report to the Board of Directors on reports and findings that require their attention and approval. In the event of a serious case or for any other reason that the case cannot be discussed with the Whistle Blowing Committee, the matter will be discussed with the Chairman of the Board and/or the Chairman of the Audit Committee.

## 10. DUTIES AND FUNCTIONS OF AUDIT COMMITTEE

All matters reported in rating of seriousness must be tabled to the Audit Committee, which is given the authority to:

- a) ensure that effective implementation of the whistle blowing practices and appropriate structure, resources and systems are in place for;
- b) establish procedures for reporting and handling reports received, including to:
  - i. appoint the right person to handle reports received and maintenance of records;
  - ii. ascertain a verification method for the reports received;
  - iii. recommend appropriate investigation approach to handle the reports received;
  - iv. set procedures to prohibit reprisal by the Group to demote, threaten, harass or discriminate in any manner against any employee reported with good faith;
  - v. safeguard confidentiality of information in relation to the report is maintained to its fullest as possible. Information shall be provided in such manner as to safeguard as much as possible the confidentiality of the identity of the reporting person; and
  - vi. propose an immediate and appropriate corrective action to be taken to the Board of Directors in consequence of the investigation.
- c) Report to the Board of Directors on reports and findings that required their attention and approval.

## 11. DISCLAIMER

The Group reserves the right to amend this policy from time to time.