



WHISTLEBLOWING POLICY

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STATEMENT OF POLICY

In accordance with its core value of always working with integrity, ARTHALAND CORPORATION (the “Company”) endeavors to provide a work environment with highest standards of behavior and conduct in its business by promoting transparency, probity, and accountability through management oversight, business policies, processes and controls, and reporting and compliance procedures.

All employees of the Company are expected to adhere to the core values of the Company and to carry out their roles with integrity, honesty and impartiality and should not engage in any inappropriate acts and behaviors that may compromise the reputation and interest of the Company as well as its employees, business partners, and customers.

This Whistleblowing Policy (“the Policy”) has been adopted to outline the mechanism for responsible reporting of malpractices, fraud, or irregularities, in any matters related to the Company.

PURPOSE

This policy presents the reporting channels and guidance on responsible and secured whistleblowing without fear of adverse consequences.

Employees and outside parties, such as suppliers, contractors, customers, and other stakeholders, are encouraged to use the procedures set in this Policy to report matters of serious nature relating to conduct by the employee/s of the Company.

PROTECTION AND CONFIDENTIALITY

The Company will treat the whistleblowing report or disclosure in a confidential and sensitive manner, and it prohibits discrimination, retaliation, or harassment of any kind against a whistleblower who submits a complaint or report in good faith.

The Company reserve the right to take appropriate action against any individual who violates this Policy (e.g., violating a whistleblower’s anonymity or engaging in retaliation against a whistleblower or where a disclosure was made in bad faith). In particular,

employees who will discriminate, harass, retaliate or threaten to retaliate the whistleblower will be subject to appropriate disciplinary actions.

On the other hand, if it should become clear that the whistleblowing reported by an employee was done in bad faith, for example, for malicious reasons or to pursue a personal grudge against another employee or manager, this will constitute misconduct and will be dealt with in accordance with the Company's Code of Conduct. Likewise, if later it is found out that the outside party making the complaint or report had done so maliciously or for personal gain or to the detriment of the Company, appropriate action, including reporting the matter to government authority, may be taken.

DISCLOSURE AND INVESTIGATION PROCESS

SCOPE OF ALLEGATIONS COVERED

The Company does not and will not tolerate any wrongful, improper, or unlawful conduct motivated by premeditated or intentional purpose or by willful indifference to the adverse consequences of the act to the Company and its employee. Examples include but not limited to:

- Fraud, dishonesty
- Instances of bribery or corruption
- Illegal acts (e.g., theft, drug sale or use, violence, harassment, damage to property, money laundering or other breaches of law)
- Fraud/Unethical Actions (e.g., misappropriation of funds, unauthorized use of classified documents, dishonestly altering company records, engagement partiality, impropriety or fraud relating to internal controls, accounting, auditing and financial matters, collusions with contractors/suppliers and/or competitors, conflict of interest, inside trading, disclosure matters, willful breach of the Company's Code of Conduct)
- Actions that are potentially damaging to the company or dangerous to employees or individuals connected with it (e.g., unsafe work practices, substantial wasting of resources)
- Actions likely to cause financial loss to the Company or damage its reputation or be otherwise detrimental to the Company's interests
- Any other kind of serious impropriety

- Deliberate concealment of any of the above

Generally, the whistleblowing disclosure/report does not include personal and work-related grievances (e.g., allegations of work discrimination, bullying or harassment, perceived unfair treatment by a line manager, complaints about work environment, issues concerning pay or benefits). These should be referred to the Head of Human Resource Department. In the event that the Human Resource grievance process is perceived as inadequate or inappropriate, allegations may be lodged through the whistleblowing process where it will be evaluated whether to accept it as whistleblowing matter or refer it back to the appropriate Human Resource process.

MAKING AN ALLEGATION

- A. All employee and outside parties are encouraged to put their names to their allegations. Concerns or irregularities expressed anonymously are more difficult to act upon effectively, but these will be considered, taking into account the seriousness and credibility of the issues raised, and the likelihood of confirming the allegation from attributable sources and information provided.
- B. The allegation should contain as much specific factual information as possible including:
- A clear statement that the allegation is being raised as a whistleblowing matter
 - All facts describing the alleged event, issue, or matter
 - The name of the persons/parties involved
 - Date, time, and location
 - Facts relevant to urgency
 - Documentation, witnesses, or other supporting evidence
 - Where possible, contact details in case further information is required
- C. The whistleblower should submit a report via:

Email: whistleblow@arthaland.com

REVIEW AND INVESTIGATION PROCESS

- A. The Company will designate at least two officers who will have access to the email where all allegations/issues received will be reported to the Chairman of the Audit and Risk Committee. For allegations/issues relating to senior management, the matter will also be escalated to the Board of Directors.
- B. The designated officers are responsible for maintaining a centralized repository of all reported allegations and ensuring that allegations/issues raised are properly resolved.
- C. All received allegations/issues will be reviewed by the designated officers within a reasonable time period. After due evaluation and consideration, a decision will be made on whether or not to endorse the matter for a detailed investigation or direct the allegations/issues to the relevant department best placed to address it.

Should the allegation/issue lack sufficient evidence for investigation, or be determined as not a bona fide, the whistleblower will be informed that there will be no investigation to be conducted.

- D. When the whistleblower is anonymous, the designated officer/s will send an acknowledgment receipt to the email address where the allegation/issue is received and confirm that such allegation will be evaluated and appropriate investigation will be conducted, if warranted.

The designated officer/s will reach out to the whistleblower to:

- a. Ask if the whistleblower is ready to identify himself to assist in the investigation
- b. Obtain further information, if possible, relevant to the investigation

If the whistleblower decides to remain anonymous, the investigation will proceed on that basis. However, there will be limitation on what can be achieved by the investigation process in those circumstances.

- E. When the whistleblower is identified, the designated officer/s will confirm receipt of the allegation and that the matter will be reviewed and investigation will proceed, if needed.

The designated officer/s will contact the whistleblower to ask whether the former's identity can be shared with the investigator. If the whistleblower is an employee of the company, he/she will as be asked whether he/she consents to his/her identity being shared with the Head of Human Resource so that necessary support and protection can be provided throughout and after the investigation, if required.

If the whistleblower does not want his/her identity to be disclosed, he/she will be advised that confidentiality of his identity will be maintained to the fullest extent possible. The allegation will then be forwarded to the Investigator without disclosing the whistleblower's identity.

If the whistleblower agrees to disclose his/her identity, the allegation will be forwarded to the Investigator with the name and contact details of the whistleblower. The information may also be shared with other relevant officers in accordance with the whistleblower's consent.

- F. Internal Audit is the default investigator. However, depending on the nature of the allegations, appropriate Department Heads (e.g., Legal, Human Resource, Finance) may be asked to lead or join in the investigation or a special team may be formed. External investigator or specialist may also be engaged to conduct or assist in the investigation, as necessary.
- G. The whistleblower will be informed of the result of the investigation.
- H. If the investigation determines that the allegation/issue is substantiated, effective remedial action commensurate with the severity of the offense will be taken.

RECORD RETENTION

Pertinent documents and information will be kept in a locked area which is only accessible to authorized personnel, including details of corrective action taken. Copy of the documents may be included in the personnel file of the erring employee.

ACCESS TO WHISTLEBLOWING CONTACT DETAILS

The Company ensures and encourages safe and secure reporting of activities involving fraud, misconduct, abuse, other violations of company policies and laws and regulations.

The following statements may be included in relevant Company documents and contracts:

“If you reasonably suspect or become aware that any Arthaland employee, or anyone working on its behalf, may have engaged in misconduct, you may report your concerns by sending an email to:

E-Mail: whistleblow@arthaland.com

Our Company believes that it is essential that you feel secure when raising a concern, and we encourage you to communicate your concerns openly. Your email will be treated confidentially, consistent with the need to investigate and address the matter and subject to applicable laws and regulations. “

CASCADE OF THE POLICY

The Human Resources Department should include the topic of whistleblowing in the New Hires Orientation. Periodic refresher program should also be cascaded to regular employees.