

# APM'S SPECIAL COMPLAINTS POLICY / WHISTLEBLOWING POLICY

FOR ALL  
EMPLOYEES AND  
STAKEHOLDERS



<b>Effective Date (SCP):</b>	14 May 2013	<b>Document ID:</b>	APM/APMCSS/GC/SCP/1
<b>Revision No:</b>	1	<b>Effective Date (Revision 1):</b>	21 February 2020
<b>Document Owner:</b>	Group Compliance	<b>Approved by:</b>	Board of Directors
<b>Revision 1 by:</b>	Group Legal	<b>Endorsed by:</b>	*RMSC



## APM'S SPECIAL COMPLAINTS POLICY/WHISTLEBLOWING POLICY ("SCP")

### DOCUMENT CONTROL

SCP Effective Date	Revision Details/Remarks	Revision	Revision Effective Date
14 May 2013	<ul style="list-style-type: none"><li>Commencement of SCP.</li></ul>	0	N/A
	<ul style="list-style-type: none"><li>Updating of reporting channels;</li><li>Updating of the general contents to be in line with APM's Anti-Corruption and Anti-Bribery Policy and the latest changes.</li></ul>	1	21 February 2020

\*RMSC: APM's Risk Management and Sustainability Committee

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## 1. PREAMBLE

This Policy establishes a procedure that allows employees of **APM Automotive Holdings Berhad and its group of companies (“APM Group” or “APM”)** and other interested person (“**Stakeholders**”) to report anonymously and confidentially on any questionable practices and internal control breakdown without fear of retaliation.

## 2. EMPLOYEES’ RESPONSIBILITIES ON WRONGDOING

Employees of APM Group (“**Employees**”) are encouraged to speak with their supervisors, managers or other appropriate management personnel regarding any wrongdoing unless the wrongdoing involves them. Wrongdoing shall mean, but not limited to the reporting of actual or suspected:

- fraudulent activities;
- misappropriation of monies;
- misrepresentation;
- concealment of facts or information with intention to mislead;
- violation of APM’s policies, standard operating procedures, directives and codes,
- violation of laws and regulations;
- endangerment of employees or public health and safety; and
- sexual harassments.

Reporting on suspected or actual violation of APM’s Anti-Corruption and Anti-Bribery Policy like taking or giving kickbacks, bribes, favors, privileges etc. should be done through the said Anti-Corruption and Anti-Bribery Policy itself.

## 3. ACTING IN GOOD FAITH

Persons who file a report concerning any wrongdoing (“**Complainant**”) must act in good faith and have reasonable grounds for believing the information disclosed indicate such violation.

Any allegations that proved to be unsubstantiated and/or made with malicious intent will be viewed as a disciplinary offence.

## 4. APM’S GROUP COMPLIANCE OFFICER (AGCO)

An individual appointed by the APM Group’s Executive Chairman and the Board of Directors to perform APM Group compliance functions. He is the custodian of this policy and ultimately responsible for ensuring that its objectives are embedded in the daily operations of APM Group.

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## 5. NO RETALIATION

No Complainant shall suffer harassment or retaliation.

An Employee who retaliates against a Complainant who has reported any wrongdoing in good faith can be subject to disciplinary action up to and including termination of employment.

## 6. MAKING A REPORT

Employees and stakeholders can directly report alleged wrongdoing or retaliation as follows:

Mode	Description
<b>By E-mail</b>	<a href="mailto:groupcompliance@apm.com.my">groupcompliance@apm.com.my</a>
<b>By Telephone</b>	+603-31618888 Ext. 8933 (Group Compliance)
<b>By Mail</b>	APM Automotive Holdings Berhad Lot 600, Jalan Raja Lumu, Pandamaran Industrial Estate, Locked Bag 218, 42009 Port Klang, Selangor Darul Ehsan, Malaysia. Attn. Group Compliance Officer
<b>Operating Hours</b> <b>8am – 5.30pm, except Saturdays, Sundays and Public Holidays (Malaysia)</b>	

Complainants are encouraged to: (i) provide complete details of the wrongdoing or retaliation (including attaching supporting documents, if any) and (ii) leave their contact details for clarification and follow-up purposes.

## 7. DISCLAIMER

We reserve the right to reroute all complaints submitted through the respective channels within the Group for further action.

## 8. CONFIDENTIALITY & RETALIATION

Complainants are encouraged to provide their identity when a report or disclosure is made to facilitate follow-ups and clarifications if and when required. Complainant's identity will be kept confidential unless disclosure is required under the law or through legal process or permitted by the Complainant.

We will not tolerate any harassment or victimization towards you and will take appropriate action to protect you if you raise the concern in good faith. Any party that retaliates against the person who has

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reported any wrongdoing in good faith may be subjected to appropriate disciplinary action, up to and including dismissal or legal action, where applicable.

## 9. GOOD FAITH

Those who file a complaint concerning an improper activity must act in good faith and have reasonable grounds for believing the information disclosed is true. Any allegations that proved to have been made with malicious intent will be subjected to appropriate action, up to and including legal actions, where applicable.

## 10. VALIDITY OF THIS POLICY

Until there is any change in or replacement of the document that is approved by the Board, this current Special Complaints Policy remains valid and is an official document for APM Group.

## 11. ENQUIRIES

For enquires, please contact:

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<b>By E-mail</b>	<a href="mailto:groupcompliance@apm.com.my">groupcompliance@apm.com.my</a>
<b>By Telephone</b>	+603-31618888 Ext. 8933 (Group Compliance)
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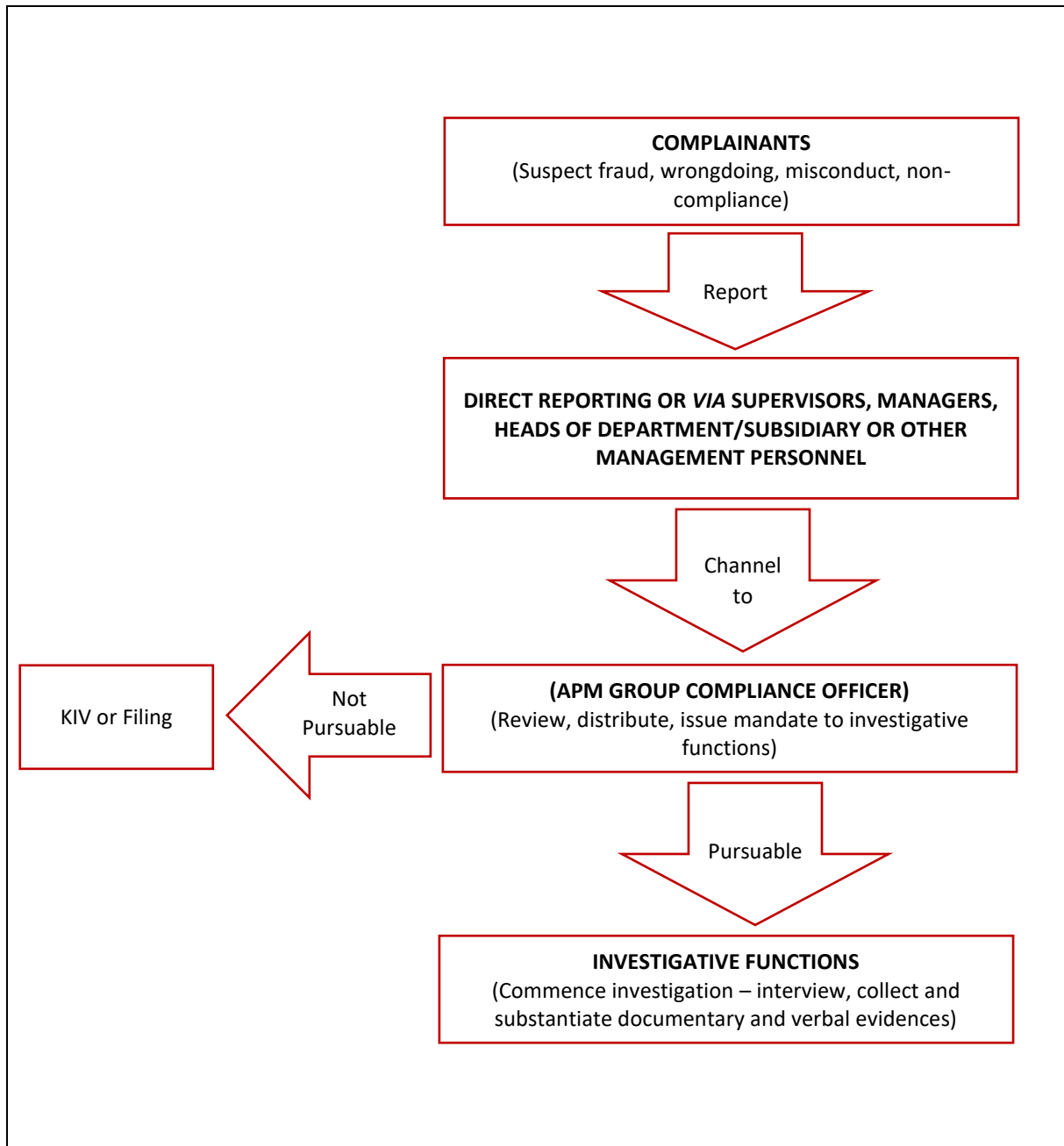
Attachment:

Appendix 1: Special Complaints Flowchart

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