



RGB International Bhd. (603831-K)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

(Last Revision Date: 17 April 2017)

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1. OVERVIEW

- 1.1 RGB International Bhd. ("the Company") and its subsidiaries ("the Group") are committed to achieving and maintaining high standard of integrity, accountability and ethical behaviour in the conduct of its businesses and operations.
- 1.2 In order to achieve the standards set therein, the Company therefore encourages all its employees and stakeholders to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and stakeholders who report such allegations.

2. SCOPE OF WHISTLEBLOWING POLICY

- 2.1 The primary purpose of this policy is to govern the reporting and handling of the Group's wrongdoing. This policy does not replace the Group's existing policy for handling employee grievances or similar complaints.
- 2.2 Wrongdoing shall mean, but not limited to, reporting of fraudulent financial information, actual or suspected fraud, misappropriation of monies, misrepresentation, conceal facts or information with intention to mislead, violation of laws and regulations, endangerment of employees or public health and safety, violation of Group's policies, taking or giving kickbacks, bribes, favours, privileges, criminal offence and blackmailing.

3. REPORTING IN GOOD FAITH

- 3.1 The Company expects the employees and stakeholders to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal and to act in good faith and have reasonable grounds when making a report. Malicious and false allegations reported by employees will be viewed seriously and treated as gross misconduct and if proven may lead to dismissal. The Company will also take appropriate action against the employees and/or stakeholders concerned including legal action, where applicable.

4. PROTECTION TO WHISTLEBLOWER

- 4.1 A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.
- 4.2 The Group views any harassments or retaliations in any form or manner against genuine whistleblower seriously and will treat such actions as gross misconduct which if proven may lead to dismissal.

5. REPORTING WRONGDOING

- 5.1 The whistleblower should promptly report the suspected or instances of wrongdoing to the Chairman of the Board of Directors and/or Senior Independent Non-Executive Director. The report must be in writing, submit via post, to ensure that there is a clear understanding about the issues raised.

Mail	Chairman of the Board of Directors and/or Senior Independent Non-Executive Director RGB International Bhd 8 Green Hall, 10200 Penang, Malaysia <i>Mark Strictly Confidential</i>
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- 5.2 The Chairman of the Board of Directors and/or Senior Independent Non-Executive Director who receives the report must promptly act to investigate and resolve the issue.
- 5.3 The whistleblower shall be informed on the outcome of the investigation.
- 5.4 All investigations shall be tabled to the Board of Directors that has the authority to ensure effective implementation of the whistleblower policy.

6. WHISTLEBLOWER PROTECTION ACT 2010

- 6.1 In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the Act shall prevail.