

PADINI HOLDINGS BERHAD
WHISTLE-BLOWING

1. Whistle-blower Protection Program is a program which protects all employees of Padini Holdings Berhad and its subsidiaries, other related parties with a business relationship with the Company or any other related persons who report with substantiated evidence, bona fide violations of legal, ethical and or generally accepted corporate and or workplace policies or behaviors to the Management and or to external regulatory parties, from retaliation.
2. All acts of whistle-blowing shall be deemed to have been made in good faith until investigations proved otherwise. Until investigations into any acts of whistle-blowing are completed, the whistle-blower shall be accorded protection against any kinds of adverse actions by the management; such protection accorded for any specific act of whistle-blowing shall be continued to be accorded to the whistle-blower should the investigations result in the allegations made by the whistle-blower being found to be true for as long as the whistle-blower remains an employee of the Company, but only in relation to that specific act of whistle-blowing. Even if the allegations that were the subject of any whistle-blowing were found to be untrue, no adverse actions shall be taken against the whistle-blower if the investigators were of the consensus that the whistle-blowing had been done in good faith without malice and for the good of the Company. Adverse actions in this context includes the following:
 - a. Dismissal;
 - b. Demotion;
 - c. Intimidation;
 - d. Harsh mistreatment and/or;
 - e. Any other form of punishment, disciplinary actions or denial benefits and welfare.
3. However, frivolous complaints that cannot be substantiated could result in the complainant risking censure and disciplinary action from the Company.
4. Areas of whistle-blowing:
 - a. Criminal breach of trust;
 - b. Fraudulent financial reporting;
 - c. Any act of dishonesty or fraudulent practice;
 - d. Misstatements arising from any form of misappropriation;
 - e. Illegal activities;
 - f. Violation of existing laws and or legal requirements, and or of the Company's rules and regulations or guidelines;

- g. Expenditures, whether or authorized, for the purpose of offering an inducement to an employee or a related party to do or otherwise facilitate unethical or illegal activities;
 - h. Acceptance of any form of benefit, gifts, favours offered to influence any business decisions in favour of the giver;
 - i. Acceptance of kickbacks, bribes, and like forms of inducements and;
 - j. Any other form of misconduct that might risk the Company's interest or business well-being.
- 5. A whistle-blower is free to bring the complaints or suspected cases to the Department Manager / Head or Group Human Resources & Training Manager / Executive Director / Managing Director. The case shall be forwarded to the Industrial Relations / Compliance Division, Group Human Resources & Training Department for collation. An investigative panel shall then be appointed to investigate and authenticate the complaint, and to make a proposal to the Management for further action. All parties to the whistle-blowing including the investigators undertake to keep the details surrounding the complaint and investigations in strict confidence. Information is only to be released where necessary to facilitate the investigations and only to those who need to know. The latter shall also undertake to hold the information received in strict confidence. This is for the protection of all those involved before the investigations are completed and a decision reached as to the authenticity of the subject of the whistle-blowing investigated.
- 6. In the case where reporting to the Management is a concern, the complaint may be made to the Independent Director, Ms. Tan Shi Wen, via email: whistleblower@padini.com
- 7. For detail information, please refer to HR Guideline 0015 – Whistle-blowing.