

## WHISTLEBLOWING POLICY

### **1. Policy statement**

- a. YX Precious Metals Bhd. and its subsidiaries (“YXPM” or “the Group”) are committed to achieve and maintain high standards with regards to behavior at work as set out in its Code of Conduct.
- b. In order to achieve the standards, set out in the Group’s Code of Conduct, all employees and other stakeholders including shareholders, suppliers and customers are encouraged to report genuine concerns on acts committed by employees and directors arising from unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal provided they act in good faith when reporting such concerns.
- c. This policy protects a whistleblower who lodges a report/complain against an employee and/or director for acts committed as spelt out in paragraph 1 (b) above, from any adverse employment action. YXPM views any harassment or retaliations in any form or manner against genuine whistleblower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.

### **2. Whistleblowing**

- a. Whistleblowing is a specific means to guide employee or any stakeholder of the Group to report or disclose through establish channels, concerning unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in future.
- b. Only genuine concerns should be reported under our whistleblowing procedures. This report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the report is not made for personal gain.
- c. If the employee makes a report in good faith, no action will be taken against the employee even if such complain is not substantiated and confirmed by subsequent investigations. However, employee is advised to exercise due care to ensure the accuracy of the information given. If an employee makes mala fide report and if proven, disciplinary action may be taken against such employee. If a vendor lodges mala fide report, the Group may consider lodging police report and/or take other necessary actions deemed appropriate.

### **3. Procedures**

- a. Any complain should be brought up directly with immediate superior. If for any reason, it is believed that such action is not possible or appropriate, then the concern should be reported to Group Managing Director (“Group MD”)
- b. In the case where reporting to management is a concern, then the report should be brought up directly to the Chairman of the Audit Committee.

#### **4. Action**

- a. All reports will be investigated promptly by the person receiving the report. The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- b. All reports and identity of the whistleblower will be treated in a confidential and sensitive manner. A report will only be disclosed to those who are authorized to carry out investigation into matters relating to the report.
- c. The Group encourages the whistleblower to state his/her name to their respective report, where possible. Any person making anonymous report will be advise that maintain anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as it is permitted by law or the person making the report indicates that he no longer wishes to remain anonymous.
- d. Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation. Any decision taken by the Audit Committee will be referred to the Board of Directors for endorsement before implementation.
- e. Where possible, remedial actions will also be implemented to prevent similar situation from arising in future.

#### **5. Further action**

- a. If for any reason, the whistleblower is not satisfied with the way his report had been dealt with, he can escalate his report to the Chairman of the Audit Committee.
- b. The Chairman of Audit Committee will deliberate the report with his committee members and decide on the appropriate course of action.
- c. The decision of the Audit Committee on the report shall be final.