

SUMMARY OF KENANGA’S SPEAK UP POLICY

<p>1. Policy Statement on the Culture of Speaking Up</p>	<ul style="list-style-type: none"> (i) Kenanga Investment Bank Berhad and its subsidiaries (“KIBB Group”) is committed to ensure that its businesses and operations are conducted in an ethical and transparent manner in order to facilitate long-term growth and sustainability. (ii) Kenanga Group has in place a Speak Up framework that demonstrates its commitment towards establishing a culture with underlying principles of ethics and integrity and high standards of corporate governance and in this regard, the Speak Up Policy lays the foundation of the framework. (iii) The Speak Up Policy is premised on the motto “Your Voice Makes a Difference” whereby the legitimate concern of each and every stakeholder of Kenanga Group, including employees and clients, is heard. (iv) The Speak Up Policy acts not only as a deterrent to illegal or unethical activities impacting Kenanga Group but to also embolden the relevant parties to speak up.
<p>2. Scope of Matters within this Speak Up Policy</p>	<ul style="list-style-type: none"> (i) The reports coming within the ambit of the Speak Up Policy must be on a breach or potential breach which refers to an act or omission that is unlawful and/or constitutes a wrongdoing, misconduct or malpractice amounting to a crime; or disciplinary offence which contravenes applicable laws, regulations and/or Kenanga Group’s policies and procedures. (ii) Only such reports will be dealt with the mechanisms provided for by the Speak Up framework. (iii) Reports received via the Speak Up channels on other subject matters (such as queries of Kenanga Group’s products or feedback relating to services) will be forwarded to the appropriate party within Kenanga Group to be dealt with in accordance with the relevant policies and procedures.
<p>3. Person making a report under the Speak Up framework</p>	<ul style="list-style-type: none"> (i) The avenues to speak up under the Speak Up Policy is available to <u>any person</u> who has a genuine concern to raise regarding a matter coming within scope abovementioned that relates to Kenanga Group. (ii) Such persons may be both internal (employees within Kenanga Group) and external parties (shareholders, clients, contractors, consultants, or suppliers) of Kenanga Group. External parties may also include other third parties that may not have an existing relationship with Kenanga Group. (iii) Any person making a report via the Speak Up channels are urged to provide their contact details in order to facilitate communication to seek clarification or further information on the report made.

4. The information that must be provided in the report

- (i) A Speak Up Form may be used when making a report and available for download on Kenanga Group’s corporate website.
- (ii) Essentially, the following are information that should be provided in a report:
 - a description of the act, conduct or event forming the basis of the report and background of the same;
 - relevant particulars or details such as the date, time, location, and the people/parties involved;
 - the manner in which the act, conduct or event was detected or discovered; and
 - particulars of witnesses and/or or production of evidence in any medium (such as documents, photographs, and video or voice recording).

5. Persons authorised to receive reports under the Speak Up framework

- (i) There are 2 categories of persons authorised by Kenanga Group pursuant to the Speak Up Policy to receive reports. They are:
 - **Internal Report Recipient** - parties in a senior management role within Kenanga Group having diverse roles and responsibilities; and
 - **External Report Recipient** - an independent third party from outside of Kenanga Group.
- (ii) Reports to an Internal Report Recipient may only be made via email as below:

	Report Recipient	Channel
1.	Speak Up Director (Chairman of the Audit Committee)	speakupdirector@kenanga.com.my
2.	Speak Up Officer I (Group Managing Director)	speakup1@kenanga.com.my
3.	Speak Up Officer II (Group Chief Regulatory and Compliance Officer)	speakup2@kenanga.com.my

- (ii) Reports to the External Report Recipient may be made via any of the methods below:

	Method	Channel
1.	Email	kenangasppeakup@tipoffs.com.my
2.	Postal	Kenanga Speak Up (External Report Recipient) PO. Box. No. 8097 Kelana Jaya Post Office 46781 Petaling Jaya
3.	Website	https://secure.deloitte-halo.com/kenangasppeakup/?Pg=1

6. Handling of reports received under the Speak Up framework

- (i) All reports received via the Speak Up channels will be handled with the utmost level of professionalism, objectivity, independence and fairness.
- (ii) Kenanga Group will ensure that no prejudice or preconception influences arises in the handling of a Report and that the highest level of ethics and integrity is practiced throughout in considering and making any decision related to a report.
- (iii) KIBB Group may take any actions for conduct which is against the Group Anti-Fraud, Bribery and Corruption Policy notwithstanding any actions taken by the relevant authorities.
- (iv) A report will undergo a preliminary assessment to determine if the matter does indeed come within the scope of the Speak Up framework and upon confirmation that it does, will be investigated thoroughly. All investigations will be done impartially and the matter will be updated to the appropriate authorised party such as the Board of AC of Kenanga Investment Bank Bhd.

7. Protection and safeguards accorded to a person making a report

- (i) The identity of any person making a report (if so revealed) shall be kept confidential at all times unless disclosure is mandated by law, for purposes of any proceedings by or against Kenanga Group or necessary for purposes of undertaking comprehensive investigations. In such instances where disclosure is required, Kenanga Group will, to the extent permitted, notify and discuss it with the person who made the report and also, limit the disclosure only to the persons so authorised to receive the information
- (ii) A person who makes a report in accordance with and through the channels stipulated in the Speak Up Policy and made such report in good faith with reasonable and probable grounds will be protected from all forms of retaliation, disadvantage or discrimination linked to or resulting from speaking up.
- (iii) The protection and safeguards will not apply to a person making a report in the absence of good faith and shall be subject to the appropriate disciplinary actions or sanctions in accordance with the relevant policies and procedures.