

GREATECH TECHNOLOGY BERHAD

(Company No. 1270647-H)

(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1.0 POLICY STATEMENT

We, at Greatech Technology Berhad (“Greatech” or “Company”) are committed to achieving sustainable performance and delivering value to our customers and shareholders without compromising our ethical standards, behavioral expectation and trusted reputation.

As such, we operate in a manner reflecting Greatech’s core values, adhering to the best practice in corporate governance and in accordance with all applicable laws, regulations and other policies applicable to Greatech and all its subsidiaries (“Group”).

Our Code of Conduct & Ethics (“Code”) states the standards of responsibility and obligations and promotes fair dealing, integrity and ethical conduct amongst the Group’s directors and employees. This Whistleblowing Policy is designed to support the Group’s Code and facilitate employees’ and other stakeholders’ concerns about possible improprieties and details the procedures on managing disclosures of improper conduct such as bribery and corruption within Greatech at the earliest opportunity and in an appropriate way without compromising the confidentiality of the person(s) involved.

2.0 OBJECTIVE

This Policy aims to promote a workplace conducive to open communication regarding the Group’s business practices.

This Policy:

- Facilitates alert/disclosures of a bona fide complaint or report/raising of a genuine concern or allegation by any director, officer or employee of Greatech Group to an independent member of the management upon discovery of possible improper conduct.
- Facilitates the performance by any vendors, partners, associates or any individual of their assignment or conduct of business for or on behalf of Greatech Group.
- Provides protection to the individuals who have made the allegation or reported the misconduct.
- Encourage whistleblower to be confident in raising serious genuine concerns and to question and act on those concerns.
- Provide a transparent and confidential process in handling the reported case.

Version 2
Date: 29 May 2020

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3.0 SCOPE OF POLICY

- 3.1** All Directors and Employees of the Group are required to comply with the Malaysian Anti-Corruption Commission Act 2009. Section 25(1) of the Malaysian Anti -Corruption Commission Act 2009 states that: “Any person to whom any gratification is given, promised or offered, in contravention of any provision of this Act shall report such gift, promise or offer together with the name, if known, of the person who gave, promised or offered such gratification to him to the nearest officer of the Commission or police officer”.
- 3.2** All Employees, Directors, Shareholders, Consultants, Vendors, Contractors, Outsider Agencies or any parties with a business relationship with the Group are encouraged to disclose any improper conduct that may adversely impact the Group.
- 3.3** This Policy is designated to facilitate employees and other stakeholders to disclose any improper conducts through established channels. Such improper conducts is not only related to concerns and complaints regarding financial matters but also the following (not exhaustive):
- (a) criminal offences, miscarriage of justice, unlawful acts, fraud, corruption, bribery and blackmail;
 - (b) failure to comply with legal or regulatory obligations;
 - (c) misuse of the Company’s funds or assets;
 - (d) an act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
 - (e) an act of conflict of interest with suppliers, vendors or contractors;
 - (f) unsafe work practices or substantial wasting of company resources;
 - (g) falsification or destruction of business or financial records, or misrepresentation or suppression of financial information;
 - (h) abuse of power by an officer of the Company; or
 - (i) concealment of any of the above.
- 3.4** The principles underpinning this Policy are as follows:
- (a) all concerns raised will be treated fairly and properly.
 - (b) the Group will not tolerate harassment or victimisation of anyone raising a genuine concern.
 - (c) the Group will ensure no whistleblower will be at risk of suffering some form of reprisal as a result of raising a concern even if he is mistaken. The Group, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue or is acting for personal gain.
 - (d) the submission of a false or frivolous report may have consequences for the whistleblower and he may be liable for damages towards anyone who suffered from such false report.

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- 3.5** Only genuine concerns should be reported under whistleblowing procedures. The report should be made in good faith with a reasonable belief that the information and any allegations in it are substantially true, and the report is not made for personal gain. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

4.0 REPORTING PROCEDURES

- 4.1** If any employee believes reasonably and in good faith that Improper Conduct exists in the workplace, the employee should raise this concern with their immediate superior. However, if for any reason, it is believed that this is not possible or inappropriate, then the employee may report their concerns to either the:
- (a) Chief Executive Officer (“CEO”) of Greatech; or
 - (b) Chief Operating Officer (“COO”) of Greatech.
- 4.2** For more severe and serious issues, the employees or other stakeholders may choose not to discuss with any of the above person(s). Instead, the employee and other stakeholders who have suspected improper conduct within the Group are encouraged to contact the following persons:
- (a) Independent Non-Executive Chairman of Greatech; or
 - (b) Chairman of ARMC of Greatech.
- 4.3** The report can also be lodged in writing so as to ensure a clear understanding of the issues raised via postal mail and/or email addressed to the following party:

(mark “**Strictly Confidential to be opened by the addressee ONLY**”)

Greatech Technology Berhad, Plot 287B Lengkok Kampung Jawa 1, Phase 3 Bayan Lepas Free Industrial Zone, 11900 Penang, Malaysia Attention: Audit and Risk Management Committee Chairman Email: mariamah@greatech-group.com	Greatech Technology Berhad, Plot 287B Lengkok Kampung Jawa 1, Phase 3 Bayan Lepas Free Industrial Zone, 11900 Penang, Malaysia Attention: Independent Non-Executive Chairman Email: hkooi@greatech-group.com
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The prescribed form in **Appendix I** should be used and all reports forwarded to designated officers in confidence.

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4.4 The disclosure should contain the following information:

- (a) Name, NRIC Number and contact numbers
- (b) Details of allegation (who, what, when, where, how) and other relevant information
- (c) The reason and basis for raising the observation
- (d) Location and date / time the alleged misconduct took place
- (e) Any available supporting evidence

4.5 Any anonymous disclosure will not be entertained to prevent invalid malicious reporting, poison letters, exploitation and victimization. However, Greatech reserves the right to investigate into any anonymous disclosure.

5.0 CONFIDENTIALITY

5.1 Reports of Improper Conduct or suspected Improper Conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The unauthorized disclosure of whistleblower's information or the identity of a whistleblower by any employee may constitute misconduct for which, if established, disciplinary measures will be imposed. This is important to provide protection for whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such suspected person(s) confidentially. It is to treat both the whistleblower and alleged wrongdoer fairly and to protect Greatech from potential civil liability.

5.2 Protection under 5.1 above will be accorded by the Company only when the whistleblowers satisfied all the following conditions:

- the disclosure is done in good faith
- the whistleblower is aware that the information and any allegations disclosed are true
- the whistleblower has not communicated the disclosure to any party not related to the disclosure
- the disclosure made is not for personal gain or interest

5.3 Until the investigation is completed, employee(s) under investigation will be treated confidentially and fairly. On the completion of the investigation, the name of the alleged employee(s) may or may not be disclosed depending on the nature, extent and circumstances of the incident and is subject to the Board's decision on consultation with the Legal Counsel (where necessary).

5.4 Except for cases that are reported to external authority (e.g. Malaysian Anti-Corruption Commission ("MACC"), Police), Greatech shall ensure the confidentiality and protection of whistleblowers who report on incidents/ instances of misconduct in good faith.

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6.0 INVESTIGATION

- 6.1** The CEO/COO shall have the authority to appoint an Investigating Officer (“IO”) to carry out the reports of improper conduct or suspected Improper Conduct. The IO, if appointed within Greatech must be an employee of a designation higher than the employee(s) implicated in the Improper Conduct.
- 6.2** In instances where the improper conduct is more technical in nature or involves Board of Directors or Senior management, the Independent Non-Executive Chairman/ARMC Chairman may request the IO to be recruited from independent external party who possess the necessary technical knowhow or obtain outside legal or other professional, at the Company’s expense to efficiently conduct the investigation.
- 6.3** The IO shall have the full and unlimited/unrestricted access to all information and documents/resources which are required in the investigation of the Improper Conduct and all the employees within the Group is bound to extend their co-operation upon request by the IO.
- 6.4** At the conclusion of the investigation, the IO will submit an investigation report of the findings to the CEO/COO or to the Independent Non-Executive Chairman/ Chairman of ARMC when the improper conduct is involving Board of Directors or Senior management.
- 6.5** The CEO/COO or the Independent Non-Executive Chairman/ Chairman of ARMC must maintain a record of reports and the outcome will be reported, as necessary, to the ARMC or the Board of Directors accordingly. The report has to be in a form which does not endanger employee’s confidentiality.
- 6.6** The whistleblower will be notified on the outcome of the disclosure and actions taken or reason(s) should it be decided that no action is to be taken after investigation.

7.0 DECISION AND ACTIONS TAKEN ON INVESTIGATION OUTCOME

- 7.1** Depending on the severity of the case, Greatech reserves the right to make any decision based on the findings and the recommended actions by the CEO, COO, ARMC and/or Board of Directors of Greatech.
- 7.2** If an investigation results in a recommendation to terminate the employee, the decision to terminate will be made in conjunction with Group Human Resources and, if necessary, the Legal Counsel.

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8.0 AMENDMENT

Greatech reserves its right to amend or modify the Whistleblowing Policy in whole or in part, at any time without assigning any reason whatsoever, subject to the approval of the Board of Directors. However, no such amendment or modification will be binding on employees unless the same is circulated to employees in writing or electronically.

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Appendix I - Whistleblowing Reporting Form

PART A To be completed by individual raising a concern		
1.	Details of Whistleblower	
	Name:	
	Contact no.:	
	Email:	
2.	Issue Raised:	
	Nature of the Concerns:	
	Background, Date and History of the Concerns:	
	Identity of the Person Engaged in Improper Conduct:	
	Reasons for the Concerns:	
	Details of Evidence and Witnesses:	
	Whether Action Has Already Been Taken and By Whom:	
	Whether Whistle Blower Has Any Personal Interest in the Matter Reported:	
	Submitted by: Name: Date: Time:	Received by: Name: Date: Time:
PART B To be completed by Investigator / Investigating Officer		
3.	Additional information	
4.	Investigation of Concern / Steps Taken to Address the Concern	
5.	Findings	
6.	Recommendations	
7.	Preventive Measures to be Taken	
	Prepared by: Name: Date: Time:	

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History of Whistleblowing Policy

Date	Description
10 June 2019	Approval of the Whistleblowing Policy
29 May 2020	Updates on the Whistleblowing Policy in accordance with MACC Act