

# WHISTLEBLOWING POLICY OF OPENSYS (M) BERHAD

## WHISTLEBLOWING POLICY AND PROCEDURES

### 1. Policy Statement

- (a) OpenSys (M) Berhad (“OpenSys”) is committed to achieving and maintaining high standards with regards to behaviour at work.
- (b) All employees and stakeholders (i.e. shareholders/suppliers/customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.
- (c) OpenSys views any harassments 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.
- (d) The policy and procedures are applicable to all companies within OpenSys Group.

### 2. Whistleblowing

- (a) Whistleblowing is a specific means by which an employee or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirement that is taking place/has taken place/may take place in the future.
- (b) Only genuine concerns should be reported under 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. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

### 3. Procedures

- (a) Any concern should be reported to the Executive Chairman. Channel of reporting to the Executive Chairman is:-

Name : Mr. Tan Kee Chung  
Email : kctan@myopensys.com  
Telephone : 03-79686868  
Mail : **Mark Strictly Confidential**  
Address : OpenSys (M) Berhad  
Level 26, Tower A,  
Pinnacle PJ, Jalan Utara C,  
46200 Petaling Jaya,  
Selangor Darul Ehsan.  
Attention: Executive Chairman

- (b) In the case where reporting to management is a concern, then the report should be made to any one of the Independent Directors. Channels of reporting to the Independent Directors are:

(i) Name : Dato' Abdul Manap bin Abd Wahab  
Email : manap.almerbawi@gmail.com  
Mail : **Mark Strictly Confidential**  
Address : Level 15-2, Bangunan Faber Imperial Court,  
Jalan Sultan Ismail,  
50250 Kuala Lumpur.

or

(ii) Name : Datin Lee Choi Chew  
Email : leechoichew@yahoo.com  
Mail : **Mark Strictly Confidential**  
Address : Level 15-2, Bangunan Faber Imperial Court,  
Jalan Sultan Ismail,  
50250 Kuala Lumpur.

or

(iii) Name : Mr. Wong Choong Wai  
Email : aaron.wong@alss.com  
Mail : **Mark Strictly Confidential**  
Address : Level 15-2, Bangunan Faber Imperial Court,  
Jalan Sultan Ismail,  
50250 Kuala Lumpur.

#### 4. Action

- (a) All reports will be investigated promptly. The progress of investigation will be reported to the Audit Committee no later than at the next scheduled meeting.
- (b) All reports received, whether anonymously or otherwise, will be treated strictly as confidential.
- (c) The person making anonymous report will be advised that maintaining anonymity may hinder an investigation. Irrespective of this, anonymity will be maintained as long as it's 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. Decision taken by the Audit Committee will be implemented immediately.
- (e) Where possible, steps will also be implemented to prevent similar situation arising.

## 5. Further action

- (a) If for any reason, the person making the report is not satisfied with the way his report had been dealt with, he may escalate his report to the Audit Committee Chairman directly for further review. Channel of reporting to the Audit Committee Chairman is: -

Name : Dato' Abdul Manap bin Abd Wahab  
Email : manap.almerbawi@gmail.com  
Mail : **Mark Strictly Confidential**  
Address : Level 15-2, Bangunan Faber Imperial Court,  
Jalan Sultan Ismail,  
50250 Kuala Lumpur.  
Attention: Audit Committee Chairman of OpenSys (M)  
Berhad

- (b) Audit Committee Chairman will deliberate the report with the Audit Committee members and decide on the appropriate course of further action.