P: +603 6148 0890
F: +603 6148 0891
info@infolinegroup.com

INFOLINE TEC GROUP BERHAD 202101032489 (1432789M)
NO 53-3, Jalan PJU 5/20E, Pusat Perdagangan Kota Damansara,
47810 Petaling Jaya, Selangor.

PUBLIC USE

"INFOLINE TEC" GROUP OF COMPANIES

STANDARD POLICY & PROCEDURE	EFFECTIVE **1 March 2025**	REV. NO. **1**
SUBJECT **WHISTLE-BLOWING**		

1. INTRODUCTION

Infoline Tec Group Berhad ("**INFOLINE TEC**") and its group of subsidiaries ("**Group**") are committed to promote and maintain high standards of transparency, accountability, ethics and integrity in the conduct of its business and operations.

Accordingly, the Board of Directors of the Company has established this Whistle-blowing Policy to provide an avenue for all employees ("**Employees**") and members of the public to voice or raise genuine concerns in a responsible and appropriate manner.

2. OBJECTIVE OF THE POLICY

This Whistle-Blowing Policy ("**Policy**") is formulated to enable the reporting of genuine concerns about any actual or possible improprieties at the earliest opportunity so that appropriate actions can be taken to address or mitigate such concerns.

This Policy is designed to:

i. promote and maintain high transparency and accountability in the workplace;
ii. promote good corporate governance practices in the workplace;
iii. ensure that employees can raise concerns without fear of reprisals and safeguard such person's confidentiality;
iv. protect a whistle-blower from reprisal as a consequence of making a disclosure;
v. provide a transparent and confidential process for dealing with concerns;
vi. protect the long-term reputation of the Group; and
vii. maintain a healthy working culture and an efficient corporation.

3. SCOPE OF POLICY

This Policy applies to all Employees, third parties of the Group, and the general public, who has become aware of or genuinely suspect on a reasonable belief that a person associated with the Group, including a Director, Employee, and a third party who has a business relationship with the Group, has engaged, is engaging or is preparing to engage in any improper conduct or wrongdoing. A person who has made a report via this Policy is hereinafter referred to as a "**Whistle-blower**".

Such improper conduct or wrongdoing ("**Wrongdoing**") may include, without limitation, the following:

i. fraud or deliberate error in the preparation, evaluation, review or audit of any financial statements of the Group;
ii. fraud or deliberate error in the recording and maintaining of financial records of the Group;
iii. corruption, bribery and blackmail;
iv. acceptance of gifts or favour beyond the threshold allowed by the Group;
v. misuse or misappropriation of Group's funds or assets;
vi. abuse of power;
vii. negligence in carrying out work obligations;
viii. conflict of interest without disclosure;
ix. criminal breach of trust;
x. illegal or criminal offence;
xi. act or omission which endangerment of employees' or public health and safety;
xii. deficiencies in or non-compliance with the Group's internal controls;
xiii. misrepresentation or false statement regarding a matter contained in the financial records, financial reports or audit reports of the Group;
xiv. deviation from full and fair reporting of the Group's financial condition;
xv. deliberate concealment of any of the above matters or wrongdoing; and
xvi. gross mismanagement within the Company (including serious potential breach of the interest of society and the environment).

Whenever possible, any concerns should be raised and dealt with through the normal reporting lines and procedures in the Group. However, where it is believed that the concern cannot be resolved through normal reporting lines and procedures, or implicates senior levels of management within the Group, or the Employee's employment or even safety or security may be jeopardised by raising the concern, then the concern can be raised through the channel provided in this Policy.

4. REPORTING IN GOOD FAITH

The Group expects a Whistle-blower to report genuine concerns in good faith and have reasonable grounds when making a whistle-blowing report ("**Complaint**"). In general, a Whistle-blower may report a Complaint in writing, electronically, or in person.

To assist the Group in the response to or investigation of a Complaint, the Complaint should contain as much specific, factual information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the Complaint, including, without limitation and to the extent possible, the following information:

i. the alleged Wrongdoing that is the subject of the Complaint;
ii. the name of the persons involved;
iii. if the Complaint involves a specific event or events, the approximate date and location of the event(s); and
iv. any additional information, documentation or other evidence available to support the Complaint.

Should you wish to do so, you may use our Whistle-blowing Report Form as set out in "***Appendix A***" to provide the details required.

The Whistle-blower is encouraged to include his or her name and contact method to enable contact for obtaining further understanding and information relating to the Complaint where necessary. Anonymous reporting is not prohibited. Nevertheless, the extent to which a Complaint can be investigated may be limited to the information provided. Alternatively, the Whistle-blower can also provide an alternate channel of communication that he or she is comfortable with, without divulging his or her personal information.

5. WHISTLE-BLOWING CHANNELS

A Whistle-blower may submit Complaints to the Chairman of the Risk Management Committee ("**RMC**") and Independent Non-Executive Chairman , who is designated to handle whistle-blowing matters, via the following channels:

i. Mail to:
INFOLINE TEC GROUP BERHAD
Level 7, Menara Milenium, Jalan
Damanlela, Pusat Bandar Damansara,
Damansara Heights, 50490 Kuala
Lumpur, Wilayah Persekutuan.

Attn: The Chairman of the RMC and The Independent Non-Executive Chairman
To indicate on the front cover of mail "Highly Private & Confidential and strictly to be opened by addressee only"

ii. Email to: whistleblowing@infolinegroup.com

Upon receipt of a Complaint, the Chairman of the RMC and Independent Non-Executive Chairman will record the Complaint and acknowledge receipt of the Complaint to the Whistle-blower.

6. CONFIDENTIALITY AND PROTECTION FOR WHISTLE-BLOWER

The Chairman of RMC and Independent Non-Executive Chairman shall maintain the confidentiality of the Complaint(s) and the identity of the Whistle-blower(s) to the fullest extent reasonably practicable within the legitimate needs of law and only be revealed to those handling the Complaint, including investigation and deliberation, strictly on a "need-to-know" basis.

The identity of the Whistle-blower(s) shall remain confidential unless consent is obtained from the Whistle-blower(s) or otherwise required by law. Notwithstanding, the identity of a Whistle-blower might become known for reasons outside the control of the Group. The confidentiality of the identity of the Whistle-blower is subjected to such limitations. The identity of other persons subject to, or participating in, any inquiry or investigation relating to a Complaint shall also be maintained in confidence subject to the same limitations.

A Whistle-blower who reports a Complaint in good faith shall be protected from any reprisal by the Group or its personnel as a direct consequence of the disclosure. Reprisal includes discharge, termination, demotion, suspension, threatening, harassment, or discrimination or retaliation, intimidation or any action causing injury, loss or damage, interference with the lawful employment or livelihood against any persons in relation to the terms and conditions of business relationships such as employment or contract.

The Whistle-blower will be protected under the Whistle-blower Protection Act 2010 if he or she makes a disclosure in good faith to an enforcement agency.

If a whistle-blower reasonably believes that he or she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he or she may consult or report to the RMC via email to:

whistleblowing@infolinegroup.com

7. NOTIFICATION OF OUTCOME

Upon the completion of the investigation and deliberation of the Complaint, the Whistle-blower will be notified of the outcome of the investigation (if contact information of the Whistle-blower is provided), where reasonably practicable. Alternatively, Whistle-blower who wishes to remain anonymous can also write to RMC to enquire about the status or outcome of the investigation via email to:

whistleblowing@infolinegroup.com

8. CONSEQUENCES OF WRONGDOING OR WRONGFUL DISCLOSURE

If the Whistle-blower has, or is found to have:

i. made a disclosure not in accordance with the requirements of this Policy (for example, dishonest, mischievous or malicious complaints);
ii. participated or assisted in any process pursuant to this Policy otherwise than in good faith;
iii. made the disclosure of improper conduct principally involves questioning the merits of government policy, including the policy of a public body; and
iv. made the disclosure of improper conduct solely or substantially with the motive of avoiding dismissal or other disciplinary action.

The corrective actions to be taken against whistle-blower will be determined by the Board of Directors which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or other forms of punishment.

9. REPORTING AND RETENTION OF COMPLAINTS AND INVESTIGATIONS

The Chairman of the RMC and Independent Non-Executive Chairman will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary thereof for the Board of Directors, on a quarterly basis, taking into consideration the protection of confidentiality especially of the identities of Whistle-blowers.

10. REVIEW OF THIS POLICY

The Board of Directors shall review and assess the relevance and effectiveness of this Policy periodically to assess their effectiveness, and in any event, at least once every 3 years in accordance to the Main Market Listing Requirement of Bursa Malaysia Securities Berhad, the Board of Directors deem necessary and/or require to ensure its relevance and effectiveness in keeping with the Group's changing business environment, administrative or operational needs as well as changes to legislation.

11. REVISION OF THIS POLICY

The provisions of this Policy can be amended and supplemented from time to time by a resolution of the Board of Directors.

APPENDIX A – WHISTLEBLOWING REPORT FORM

WHISTLEBLOWING REPORT FORM

Please provide the following details for any genuine concerns about possible improprieties or other malpractices. Kindly take note that you may be called upon to assist in the investigation, if so required.

By submitting this form, you hereby confirmed that you have read the Whistle-blowing Policy of the Company and have a clear understanding of the guidelines and procedures as laid out in the Whistle-blowing Policy.

WHISTLEBLOWER'S CONTACT INFORMATION **(If you wish to remain anonymous, this section may be left blank)**	
Name:	
Designation:	
Department:	
Supervisor:	
Contact Number:	
Email Address:	
SUSPECT'S INFORMATION (compulsory)	
Name:	
Designation:	
Department:	
Contact Number:	
Email Address:	
WITNESSES' INFORMATION (if any)	
Name:	
Designation:	
Department:	
Contact Number:	
Email Address:	

APPENDIX A – WHISTLEBLOWING REPORT FORM

COMPLAINT **(Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary. You are required to provide your response to all the questions listed below.)**	
What misconduct/ improper activity/ malpractice occurred?	
When did it happen and when did you notice it?	
Where did it happen?	
Is there any evidence that you could provide us?	
Are there any other parties involved other than the suspect stated above?	
Do you have any other details or information which may assist us in the investigation?	
If you wish to remain anonymous, how should we reach out to you? (To request further information or to notify you of the outcome of our investigation)	
Any other comments?	

Signature: _____

Date: