



## **WHISTLEBLOWING POLICY**

Globaltec Formation Berhad (“Globaltec”) is committed in achieving the highest possible standards of ethical standards in all of its practices and committed to ensuring that the business operations are carried out professionally in accordance with relevant laws, rules, regulations, business ethics and conduct, and recognise that all employees have an important role to play in achieving this goal.

The policy applies to employees of Globaltec. It also applies to external parties providing services to Globaltec such as the suppliers, advisors, consultants, internal and external auditors, Board members i.e. Board of Directors, Audit Committee, Nominating Committee and Remuneration Committee and shareholders.

The Globaltec’s Whistle Blowing Policy will:

- Govern the process through which employees and others reporting potential violations or concerns relating to relevant laws, rules, regulations, business ethics and conduct, including any violations or concerns relating to illegal, immoral, embezzlement, corruption, extortion and fraudulent activities;
- Establish a mechanism for responding to any reports from employees and others regarding such potential violations or concerns;
- Prohibit legal sanctions for retaliatory action taken against the whistle blower;
- Ensure that this policy is properly communicated to all employees;
- Establish procedures for the retention of records of reports; and
- Protect confidentiality.

This policy encourages employees’ freedom of speech, promote integrity and report any wrongful activities and wrongdoings at the earliest possible stage in the right way to proper authority so that immediate action can be taken. It also encourages employees to use internal mechanisms for reporting any wrongful activities and wrongdoings by employees or others.

The whistle blower will be protected against victimisation or other adverse treatment. However, any disclosure which is not made in good faith and is found to be deliberately falsified with malicious intent will be subjected to disciplinary action by Globaltec in accordance with the Globaltec Human Resource Policies and Procedures or other appropriate actions.

All employees of Globaltec must follow this Whistle Blowing Policy and cooperate with any review and investigation initiated pursuant to this Whistle Blowing Policy. Guidance to this Whistle Blowing Policy is provided in Whistle Blowing - Procedures that can be obtained from the respective companies “Employee Handbook”.

The Executive Directors of Globaltec shall have the responsibility for the implementation of the Whistle Blowing Policy and Whistle Blowing - Procedures. The administration of the policy and procedures is to be carried out by the Human Resources Department of the respective companies. The Board of Directors shall exercise the oversight function over the administration of the policy.

This policy does not replace any Human Resources policies and procedures that will enable the employees to lodge a grievance relating to their own employment in Globaltec.



## **WHISTLE BLOWING - PROCEDURES**

### **Whistle Blowing Procedures For Reporting Of Wrongful Activities And Wrongdoings**

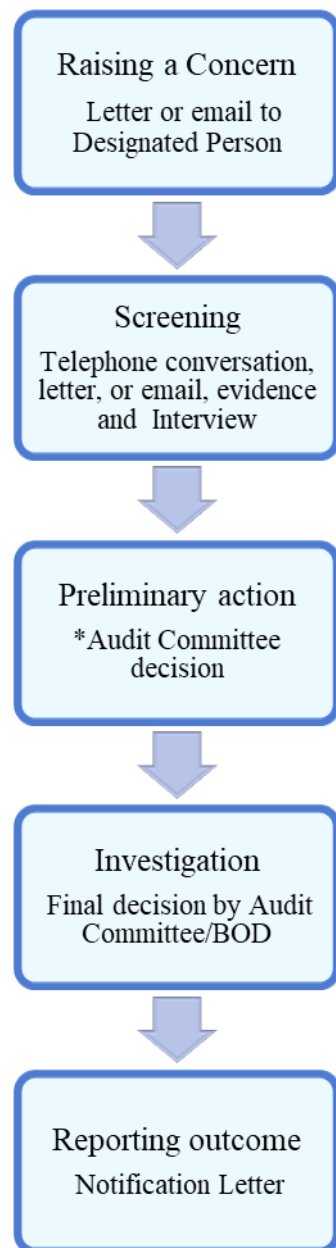
1. All report of wrongful activities and wrongdoings to be made to the Group Executive Chairman and/or Audit Committee Chairman via written letter or email.
2. The letter or email should be addressed to the “Group Executive Chairman”, “Audit Committee Chairman” and/or “The Company Secretary” and sent to the following address or email addresses:-

Globaltec Formation Berhad  
Unit 23A-12, Menara Q Sentral  
No. 2A, Jalan Stesen Sentral 2  
Kuala Lumpur Sentral  
50470 Kuala Lumpur

Email Address:

Group Executive Chairman	Tan Sri Datuk Seri Panglima (Dr) Goh Tian Chuan	<a href="mailto:tcgoh555@hotmail.com">tcgoh555@hotmail.com</a>
Audit Committee Chairman	Wong Zee Shin	<a href="mailto:sogomax@gmail.com">sogomax@gmail.com</a>

3. To facilitate the investigation, the letter/email MUST state the following minimum particulars and any anonymous complaint will not be entertained:-
  - a. Whistleblower’s contact information
    - i. Name and NRIC
    - ii. Designation
    - iii. Contact Number
    - iv. Email Address
  - b. Suspect’s information
    - i. Name
    - ii. Designation
    - iii. Contact Number
    - iv. Email Address
  - c. Complaints/concerns
    - i. Incident date
    - ii. Type of incident/complaint
    - iii. Affected parties
    - iv. Incident or event location
    - v. Supporting documents (where applicable)
    - vi. Other details or information which may assist the investigation
4. The whistleblowing process shall go through the following steps:



5. To facilitate the investigation, the complaint **MUST** state clearly in the letter of the wrongful activities and wrongdoings. Any vaguely complaint will not lead to further investigation.
6. Upon review of the letter of complaint, you may or will be call-up to assist in the investigation. Your complaint will be treated with confidentiality and the Globaltec Whistle Blowing Policy protects you against any victimisation or any other adverse treatment.
7. However, any disclosure which is not made in good faith and is found to be deliberately falsified with malicious intent will be subjected to Disciplinary Action by Globaltec in accordance with the Globaltec Human Resource Procedures Manual or any other appropriate actions