# SCIENTEX BERHAD

# WHISTLEBLOWING POLICY

## *1.0 INTRODUCTION*

At Scientex Berhad Group (hereinafter referred to as "Scientex"), our core values of honesty and integrity and dealing in a fair, transparent and just manner requires the highest standards from ourselves and in our interactions with our stakeholders such as suppliers, customers, governments and regulatory bodies and others.

Scientex is committed to integrity and ethical conduct in the way we conduct our business and operations and this is reflected in the Whistleblowing Policy ("Policy") that we seek to enforce. This Policy applies to all level of employees and stakeholders of Scientex.

## *2.0 OBJECTIVE*

The objective of this Policy is to provide a whistleblowing channel for all level of employees and stakeholders to disclose any reportable and improper conduct that is taking place, has taken place and/or may take place within Scientex. This Policy also serves to protect the whistleblower who is going to report or has reported such improper conduct through the channel provided.

## *3.0 SCOPE*

The whistleblowing matters shall include but not limited to:-

a) any financial, operational and/or non-operational malpractices, improprieties and/or irregularities;
b) any breach of contractual or non-contractual as well as statutory obligations;
c) any criminal activities;
d) any abuses of power; and
e) any attempts to conceal the abovementioned matters.

## *4.0 RESPONSIBILITIES AND REPORTING PROCEDURES*

a) All employees and stakeholders shall exercise sound discretion before reporting any whistleblowing matters.

b) In the event that the whistleblowing matter is able to be solved internally without having to escalate to the higher management, the immediate superior or head of department shall be addressed in the first instance.

c) For whistleblowing matter which is inappropriate and impossible to escalate through immediate superior and/or head of department, whistleblower shall report such matter directly to:

Name: Mr Richard Wong Chin Mun (**Chairman of Audit Committee**)
Email: richard@vistage.com.my (mark 'Strictly Private and Confidential to Addressee only')

and

Name: Mr Tan Seong Tay (**Head of Internal Audit Department**)
Email: sttan@scientex.com.my (mark 'Strictly Private and Confidential to Addressee only')

For disclosure purposes, a whistleblower shall include the following details into the written report:

i) personal details of whistleblower such as name and contact details (the personal details shall be kept confidential if a whistleblower chose not to disclose his/her identity and in any event that there is a need to disclose the identity, consent to disclose will be sought from the whistleblower prior to the disclosure);
ii) nature and basis of allegation of the report;
iii) summary of the report such as who is directly and indirectly involved, how where and when did it happen, how frequent it is, what are the items or estimated amount involved, what are the evidences (documentary or others) involved and etc;
iv) other information in relation to the whistleblowing matter; and
v) declaration of good faith of the report e.g. *"I hereby declare that the report given herein is made in good faith and on a voluntary basis to the best of my knowledge. I understand and acknowledge that my personal data and the information provided herein may be retained and processed by the Company (subject to confidentiality) for investigation purposes."*.

The abovementioned disclosure shall not be retracted by the whistleblower unless the retraction is for a valid reason.

d) All information received under the reporting channel shall be kept strictly confidential and the Head of Internal Audit shall analyse and investigate such reported whistleblowing matter and recommend appropriate actions as deemed necessary, including but not limited to:

i) widen the scope of investigation;
ii) form a domestic inquiry onto such person complained against;
iii) make reference to external advisors; and
iv) make police report.

e) The Head of Internal Audit shall maintain an effective check and balance for both whistleblower and the person complained against during the investigation stage. Upon

the completion of investigation, the Head of Internal Audit will report the outcome of the investigation to the Chairman of the Audit Committee for notation and for further recommendation, if any.

## *5.0 PROTECTION TO WHISTLEBLOWERS*

a) All whistleblowing reports shall be treated as utmost confidential and/or anonymous to the extent permitted by law. This Policy gives the assurance that the identity of such whistleblower will be kept strictly confidential and it shall be revealed only to the personnel in charge for investigation and on a need-to-know basis.

b) All whistleblowing reports shall be made in good faith and the information provided or to be provided shall be based on honest and reasonable grounds at the material time without having any malicious intention for personal interest. On the contrary, the whistleblower may face disciplinary or legal action for bad faith reporting.

c) A whistleblower who has acted in good faith shall be protected from unfair treatment as a result of the report, including but not limited to:

   i) reprisal and/or retaliation;
   ii) disciplinary or legal action; and
   iii) intimidation of suspension or termination of service.

d) In addition to this Policy, whistleblower is also protected under Section 587 of the Companies Act 2016 as well as the Whistleblower Protection Act 2010.

This Whistleblowing Policy is approved and adopted by the Board of Directors of Scientex Berhad effective from 26 June 2019.