

**PRIVASIA TECHNOLOGY BERHAD**

# **WHISTLEBLOWING POLICY**

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**29 MAY 2022**



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## **WHISTLEBLOWING POLICY**

PRIVASIA Technology Berhad (“PTB”) is committed to promoting and maintaining the highest possible standards of openness, transparency, corporate governance and accountability with regards to behaviour at work, quality service to the public and in its working practices. PTB Group (as defined below) are expected to conduct themselves with integrity, impartiality and honesty. PTB encourages the reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation.

This policy serves as a guideline for PTB’s stakeholders to report a Whistleblowing complaint to the management of PTB for action.

### **Types of Concerns**

This policy applies to all stakeholders (shareholders, directors, employees, partners, contractors, suppliers, clients/customers, government parties, professional organizations, associated companies, subsidiaries) related to PTB’s Group (which shall include the parent company, subsidiaries and associated companies) (“PTB Group”).

Types of concerns include:

- conduct which is an offence or constitutes a breach of law (whether civil or criminal) such as fraud, corruption, forgery, cheating, criminal breach of trust, insider trading, abetting or intending to commit offence;
- failure to comply with any legal obligations (whether contractual or statutory) which may be imposed on the stakeholders;
- conduct which is in contravention of PTB Group’s established written policies and guidelines and/or any conduct which undermines the ethical values of the PTB Group, i.e. integrity, honesty, accountability, transparency, fairness and the like even though there may not (yet) be any laws or procedures governing such unethical conduct;
- conduct in relation to miscarriages of justice;
- any action which creates health and safety risks (actual or potential), including risk to the public as well as other employees;
- damage to the environment;
- unauthorized use or misappropriation of public funds, PTB Group’s resources or intended destruction of PTB Group’s property;
- possible fraud;
- sexual, physical or other abuse of clients/customers/employees/suppliers and other stakeholders;
- other unethical conduct;
- commercial crime;
- breach of PTB Group’s policies including the Anti-Bribery and Corruption Policy;
- acts or omissions which are deemed to be against the interest of PTB Group, laws, regulations or public policies; or
- any attempt to conceal or suppress information relating to the above.



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### **Confidentiality of the Whistleblower**

Every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, the person who made the report under this policy (“the Whistleblower”) or any person who is involved in the investigation process will also be expected to keep the fact that the Whistleblower have raised a concern, the nature of the concern and the identity of those involved confidential. There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose the Whistleblower’s identity. The Whistleblower’s role could become apparent to third parties during the course of an investigation. In such circumstances, we will make efforts to inform you that your identity is likely to be disclosed and that all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made a disclosure. You as the Whistleblower should not contact the suspected individual in an effort to determine facts or demand restitution and should not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the PTB Group.

### **Acting in Good Faith and Protection Against Retaliation**

As a first step, you should normally raise concerns with your immediate supervisor/ manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. PTB expects all parties to act in good faith and have reasonable grounds when reporting a Whistleblowing complaint. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

Any employee who discloses wrongdoing or improper conduct in good faith and in compliance with the provisions of this policy shall be protected against any act of retaliation. For the purposes of this policy, “retaliation” is defined as any action or threat of action which is unjustly detrimental to the Whistleblower because of his/her report, including, but not limited to, harassment, discrimination and acts of vindictiveness, direct or indirect, that are recommended, threatened or taken against the Whistleblower.

### **No Immunity**

Reporting under this policy, however, in no way immunises or shields the Whistleblower against action following his or her intentional wrongdoing or improper conduct.

### **Whistleblowing Channel**

The channel will be directed to an independent director who will report directly to the members of the PTB’s Audit and Risk Committee (“the Committee”).

Any report can be submitted confidentially via email to and the following [whistleblowing@privasia.com](mailto:whistleblowing@privasia.com) information must be available:

- Background of the individual initiating the allegation
- Date(s), details and reasons why the individual is concerned about the conduct



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For further information, please visit <https://www.privasia.com/corporate-governance.html>.

Where relevant, the individual may be requested to submit evidences and documents. Any meetings arranged will be conducted discreetly and if necessary, off-site or out of the office premises.

The Committee shall assess the veracity of the report and decide on whether to investigate the claims in the report. The Committee shall detail its findings on the investigation in writing.

If there any conflicts of interest between a Committee member and the Whistleblower or any person linked to the report, the said Committee member must disclose the same to the Committee and recuse him or herself immediately from the investigation. The Committee would then substitute the recused member with an appropriate replacement from PTB.

PTB reserves the right to amend the policy and procedure as necessary to meet any change in requirements.

### **Decision**

The Committee is to decide on the appropriate disciplinary and/or corrective action in consequence to the results of the investigation. All findings and decisions of the investigation pertaining to reports under this policy shall be submitted to the Board of Directors of PTB for their review and approval.

All findings under this investigation shall be kept by PTB for a period of seven (7) years for record-keeping purposes.

Subject to any prohibition or obligations stipulated by law, PTB shall inform the Whistleblower that the investigation has been completed. However, it is at the discretion of PTB to disclose to the Whistleblower on the findings and outcome of the investigation.

### **Whistleblower Protection Act 2010**

The Whistleblower Protection Act 2010 ("Act") protects a person making disclosures of the listed concerns in both the public and private sector from any civil or criminal legal action.

If you wish to make a report pursuant to the Act, you will have to make the said report to a whistleblowing enforcement agency. Any investigations and/or actions taken thereafter would be in accordance with the Act and are independent of the procedures described in this policy.

While you are entitled to directly make a report of any concerns listed in this policy pursuant to the Act, we encourage all stakeholders of PTB to report their concerns as per this policy's procedure to help PTB remedy any wrongdoings and where relevant, to institute appropriate procedures and controls to prevent any serious damage to PTB.

In the event that there are discrepancies between this policy and the Act, the Act shall prevail.