



PRIVASIA TECHNOLOGY BERHAD

WHISTLEBLOWING POLICY

**AMENDMENT AS APPROVED BY
THE BOARD OF DIRECTORS
23 MAY 2023**



**PRIVASIA
TECHNOLOGY BERHAD**
200801023769 (825092-U)

C-21-02, 3 Two Square
Jalan 19/1, 46300 Petaling Jaya
Selangor, Malaysia

T : +603-7967 9600
WWW.PRIVASIA.COM

WHISTLEBLOWING CHANNEL

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

Any report can be submitted confidentially in writing via the following medium so as to ensure a clear understanding of the concern raised and the following information must be available:

- Background of the individual initiating the allegation, and
- Date(s), details and reasons why the individual is concerned about the conduct, via the following channel:
 - a. Formal letter by mailing it to:

Audit and Risk Management Committee
PRIVASIA Technology Berhad
Unit C-21-02, 3Two Square
No.2, Jalan 19/1
46300, Petaling Jaya
Selangor

*(to mark **CONFIDENTIAL** at the top right-hand corner of the envelope)*
 - b. Email (using the form as per Appendix A) to whistleblowing@privasia.com
 - c. Web form made available on PRIVASIA Technology Berhad official website.

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

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

INVESTIGATION OF IMPROPER CONDUCT

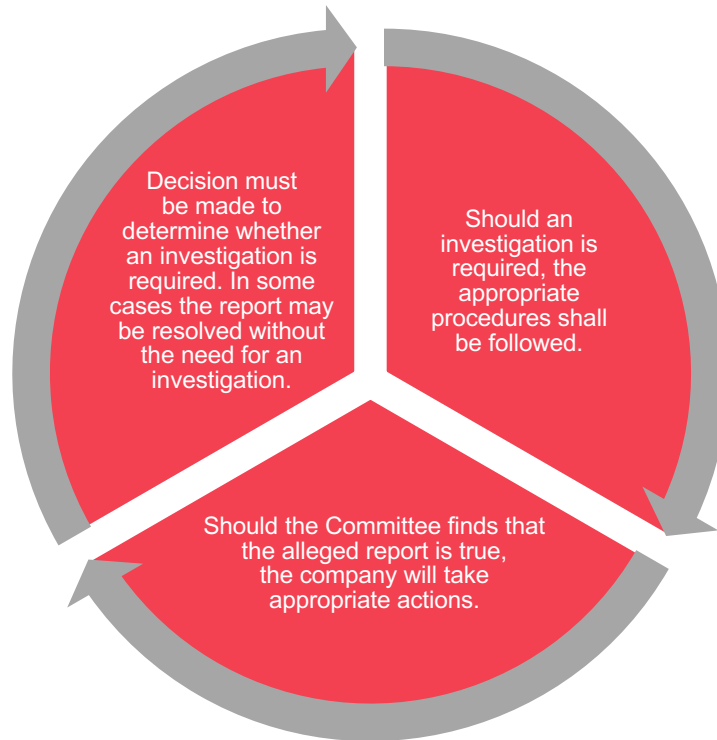
The Committee shall assess the veracity of the report and decide on whether to investigate the claims in the report. Where relevant, the individual may be requested to submit evidences and documents. Any meetings arranged will be conducted discreetly and if necessary, off-site or out of the office premises.

i. Reporting Log

- All reports received will be logged in a log register (Appendix B) administered and monitored by the Committee
- To acknowledge the Whistleblower with an acknowledgment of receipt within two (2) working days.

ii. Conducting the investigation

- Conduct an initial investigation to determine whether there is a valid case for further investigation within seven (7) to fourteen (14) working days.
- After reviewing the findings during the initial investigation, the Committee shall decide (a) to close the case in the event that there is insufficient information to the case; or (b) conduct a full investigation in the event that there is basis to the allegation.
- Should a full investigation is required, the Committee shall appoint an investigation panel which consist of one (1) Lead Investigator and two (2) members.
- All report received must be updated to the Chairman of the Board, including details of the handling process, outcome of the investigation, and actions taken from the investigation. A report which has been resolved and concluded shall also be reported to the Chairman of the Board before being classified as closed. 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.



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.

- i. in event of initial findings disclose a possible criminal offence, the Committee with the consultation of Legal Advisor may decide to refer the case to relevant authorities or law enforcement agencies as appropriate for further action;
- ii. the company will take appropriate actions deems fit following the circumstances of the matter reported including disciplinary action or termination of employment.

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

All whistleblowing reports will be treated as confidential. 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.



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APPENDIX A

WHISTLEBLOWER REPORTING FORM

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

WHISTLEBLOWER'S CONTACT INFORMATION	
NAME:	
CONTACT NUMBER:	EMAIL:
SUSPECT'S INFORMATION	
NAME:	
DIVISION & DEPARTMENT:	
CONTACT NUMBER:	EMAIL:
WITNESS INFORMATION (IF ANY)	
NAME:	
DIVISION & DEPARTMENT:	
CONTACT NUMBER:	EMAIL:
DETAILS OF CONCERNS	
DATE / TIME:	LOCATION:
DESCRIPTION OF CONCERN: <i>(Briefly describe the Misconduct and how you know about it. Specify what, who, when, where and how.)</i>	
SUPPORTING EVIDENCE <i>(IF ANY)</i> :	
SIGNATURE:	DATE:



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APPENDIX B

WHISTLEBLOWER LOG REGISTER

LOG NUMBER	DATE REPORTED	NATURE OF REPORT	INITIAL ACTION TAKEN	FINDINGS ON INVESTIGATION	ACTION TAKEN ON INVESTIGATION	DATE CLOSED