



HeiTech Padu Berhad

WHISTLEBLOWING POLICY AND GUIDELINES

28 May 2024

Version 4.0

© HeiTech Padu Berhad,

Company Number: 199401024950 (310628-D)

All rights reserved. No part of this publication may be reprinted, reproduced, stored in a retrieval system or transmitted, in any form or by any means, without the prior permission in writing from the owners.

First published and distributed in February 2017.

This edition is published and distributed in May 2024.

TABLE OF CONTENTS

	Page
PART A	WHISTLEBLOWING POLICY 1
PART B	WHISTLEBLOWING GUIDELINES 3
1.0	DEFINITION 3
2.0	OBJECTIVE 3
3.0	APPLICATION 3
4.0	REPORTING STRUCTURE 4
5.0	WHO COULD BECOME A WHISTLEBLOWER? 5
6.0	WHAT ARE THE WRONG DOINGS THAT CAN BE REPORTED? 5
7.0	WHEN TO BLOW THE WHISTLE ON WRONGDOINGS 6
8.0	PROCEDURES IN HANDLING WHISTLEBLOWING OF WRONGDOINGS 7
9.0	EXTERNAL DISCLOSURE 11
10.0	PROTECTION 12
11.0	TIME LIMITS AND RETENTION OF RECORDS 12
12.0	CIRCULATION AND REVIEW 13
13.0	PRIVACY 13
PART C	APPENDICES 14
	APPENDIX A: WHISTLEBLOWER HOTLINE 15
	APPENDIX B: WHISTLEBLOWER CHECKLIST 16
	APPENDIX C: PROCESS FLOW IN HANDLING DISCLOSURE FROM WHITSLEBLOWER 17

PART A WHISTLEBLOWING POLICY

HeiTech Padu Berhad Group of Companies ("HeiTech" or the "Company") is committed to ensure that every part of its operation is 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.

As such, the Board of Directors of HeiTech has formulated this Whistleblowing Policy to protect the values of transparency, integrity, impartiality and accountability in where HeiTech conducts its businesses and affairs. Further, as a responsible corporate citizen of Malaysia, this Policy and Guidelines, is in accordance with the Malaysian WHISTLEBLOWER PROTECTION ACT 2010 (ACT 711).

The Board of Directors of HeiTech believes that employees will usually be the first to know when an improper or illegal act is being or has been committed. Employees are encouraged to blow the whistle, in good faith, on any such potential violations or concerns according to the procedures established in this Whistleblowing Policy.

HeiTech's Whistleblowing Policy will:

- Govern the process through which employees and others may report potential violations or concerns relating to relevant laws, rules, regulations, business ethics and conduct, including any violations or concerns relating to illegal, embezzlement and fraudulent activities;
- Establish a mechanism for responding to any reports from employees and others regarding such potential violations or concerns;
- Prohibit retaliation against employees raising such potential violations or concerns; and
- Establish procedures for the retention of records and reports.

Employees who blow the whistle on wrongdoings will be protected against victimisation or other adverse treatment provided that the whistleblowing is done in good faith. However, any whistleblowing which is not made in good faith and is found to be deliberately falsified with malicious intent will be subjected to Disciplinary Action in accordance with HeiTech's Disciplinary Policy and Procedure.

All employees of HeiTech and its subsidiaries must follow this Whistleblowing Policy and cooperate with any review and investigation initiated pursuant to this Whistleblowing Policy.

The Board of HeiTech is overall responsible for the Whistleblowing Policy. The administration and implementation of the policy is to be carried out by the Governance and Integrity Department. The Integrity & Whistleblowing Board Committee shall exercise the oversight function over the administration of the policy.

PART B WHISTLEBLOWING GUIDELINES

1.0 DEFINITION

- 1.1 The word whistleblowing in the context of this Whistleblowing Guidelines (“Guideline”) refers to a situation where a person (internal or external) raises serious concerns at an early stage about risks of wrongful activities or reports a wrongdoing.
- 1.2 The person who initiates or raises serious concerns of wrongful activities or wrongdoings is referred to as “whistleblower”.

For the purpose of this Guideline, the wrongful activities and wrongdoings refer to any potential violations or concerns relating to any laws, rules, regulations, business ethics, HeiTech’s Anti-Bribery & Corruption Policy and Code of Business Conduct, including any violations or concerns relating to illegal, immoral, embezzlement and fraudulent activities.

2.0 OBJECTIVE

- 2.1 To protect the values of transparency, integrity, governance, impartiality and accountability in the manner in which HeiTech conducts its business and affairs.
- 2.2 To provide an avenue for all employees and business partners as well as the members of the public to alert the organization on any wrongdoings and harmful act that could affect the organization.
- 2.3 To provide protection to whistleblower(s) against any retaliation action that could arise subsequent to his/her disclosure.
- 2.4 Through effective implementation of this Guideline, HeiTech will enhance its accountability in preserving its integrity and will be able to stand up to public and legal scrutiny. This, in turn, enhances and builds the credibility of our stakeholders.

3.0 APPLICATION

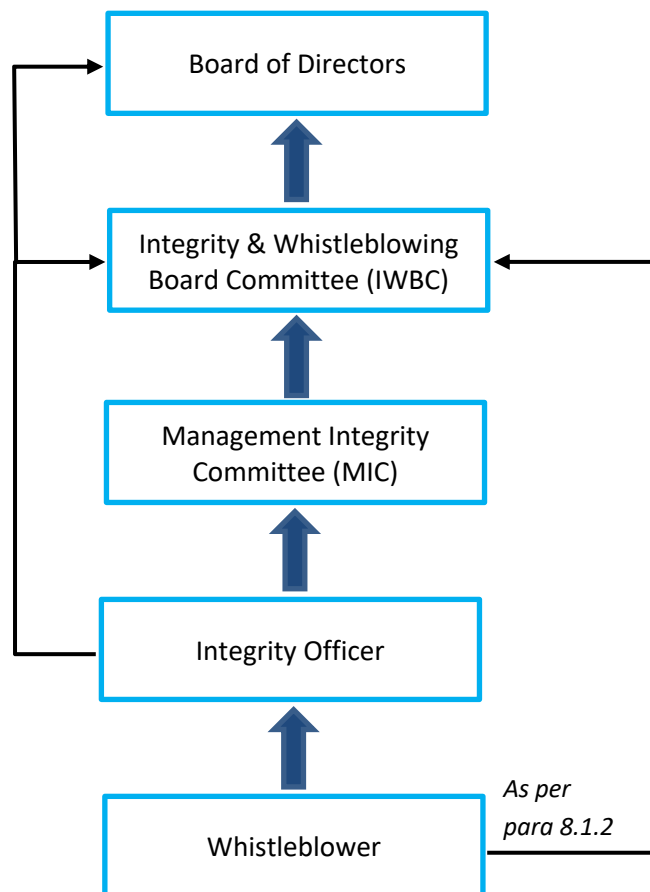
- 3.1 This Guideline will be applied in HeiTech covering all employees of HeiTech and its subsidiaries.

3.2 This Guideline will not apply to personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. However, the Whistleblowing Hotline can receive all types of complaints. Any complaints related to HR matters will be escalated to Human Resource Department and to be dealt with under existing Code of Conduct and Disciplinary Action Procedure.

4.0 REPORTING STRUCTURE

Whistleblowing reporting structure

The Whistleblowing reporting structure is as shown below:



Note:

A Whistleblower should report directly to the Integrity Officer. However, the whistleblower could also directly contact the Chairman Integrity & Whistleblowing Board Committee in accordance with paragraph 8.1.2 for matters relating to the Integrity Officer or Management Integrity Committee Members.

5.0 WHO COULD BECOME A WHISTLEBLOWER?

In accordance with this policy and guidelines, any of the following people could become a whistleblower:

- a. HeiTech and its subsidiaries' employees including employees on contract terms, temporary or short-term employees and employees on secondment;
- b. HeiTech's business associates that include investors, customer, JV/consortium partners, principal partner, vendor, contractors, consultants, advisers, agents, representatives, etc; and
- c. Any external parties, members of public who have the information or knowledge of wrongdoings in HeiTech and its subsidiary companies.

6.0 WHAT ARE THE WRONG DOINGS THAT CAN BE REPORTED?

6.1 A qualified disclosure may be made if it relates to one or more of the following wrongdoings by any employees in the conduct of HeiTech's business or affairs that is being, has been, or is likely to be committed:

- a. Failure to comply with legal obligations;
- b. Criminal offence;
- c. Corruption or fraud;
- d. Misuse or abuse of HeiTech's funds or assets;
- e. Gross mismanagement within HeiTech;
- f. Serious financial irregularity or impropriety within HeiTech;
- g. Repeated ill-treatment of a client/customer/supplier despite a complaint being made;
- h. A serious breach of HeiTech's Policy and Procedures;
- i. A breach of HeiTech's Anti-bribery and Corruption Policy;
- j. A breach of HeiTech's Code of Business Conduct;
- k. A breach of any terms and conditions as contained in business contracts or agreements with clients, customers and/ or business associates;

- l. Actions which endanger the health or safety of employees or the public;
- m. Failure to comply with the provisions of the Government Laws and Regulations where the wrongdoer, knowingly, disregards or does not comply with such provisions;
- n. Any acts of collusion with any party with the intent of gaining an unfair advantage when conducting business with or on behalf of HeiTech;
- o. Knowingly directing, misleading or advising a person to commit any of the above wrongdoings;
- p. Harassment in any nature or method; and
- q. Any action which is intended to conceal any of the above.

The above list is not exhaustive and there will be instances where employees would need to exercise judgement.

- 6.2 A whistleblower will not be expected to prove the truth of an allegation but must be able to demonstrate that there are sufficient grounds to have a reasonable belief that something is wrong.
- 6.3 A whistleblower is unsure whether a particular act or omission constitutes a wrongdoing under this Guideline, he or she is still encouraged to contact the Integrity Officer, for clarification. If you are in doubt, you are encouraged to send an email (use a pseudonym, if preferred, but provide us with an avenue to contact you) to seek clarification, before making a formal complaint.

7.0 WHEN TO BLOW THE WHISTLE ON WRONGDOINGS

- 7.1 A whistleblower should immediately come forward with any information that he or she, in good faith, reasonably believes discloses a wrongdoing is likely to happen, is being committed or has been committed.
- 7.2 However, a whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure. If he or she knows as a matter of fact that there are serious risks that a wrongdoing is going to take place, such bonafide concerns should be raised immediately i.e. the whistleblower is able to show the reasons for concern.
- 7.3 All complaints received shall be treated as allegations and will not be accepted as the truth until sufficient evidence is established. As such, the whistleblower

is encouraged to provide adequate evidence, for Governance & Integrity department to conduct an enquiry or an investigation into the matter.

7.4 WARNING – DO NOT MAKE UNSUBSTANTIATED CLAIMS OR ACCUSATIONS WITH MALICIOUS INTENT!

8.0 PROCEDURES IN HANDLING WHISTLEBLOWING OF WRONGDOINGS

8.1 INITIAL STEP

8.1.1 When an employee is of the opinion that specific concern falls within the scope of this Guideline and cannot be resolved through existing procedures, he or she can choose to make a report orally or in writing/email and submit it to Integrity Officer. (Refer to Appendix A: Whistleblowing Hotline).

8.1.2 In the event the whistleblower has a reasonable belief that there is serious malpractice relating to any of the wrongdoings specified in paragraph 6.1 and it is not properly being dealt with by Integrity Officer, the whistleblower can make a report directly to the Chairman Integrity & Whistleblowing Board Committee.

8.1.3 The whistleblower can also report directly to President/ Executive Deputy Chairman of HeiTech if they believe that the action taken as per this policy and procedure has not been satisfactory or adequate.

8.1.4 The whistleblower should inform the Integrity Officer of all details of his or her concerns as reasonably as possible, including:

- a. Nature of wrongdoing;
- b. The date of occurrence or incidence;
- c. Time and place of its occurrence;
- d. The identity of the alleged wrongdoer(s);
- e. Particulars of witnesses, if any;
- f. Particulars or production of documentary evidence, if any and;
- g. Other details deemed to be useful to facilitate screening and action to be carried out in paragraphs 8.2, 8.3 and 8.4.

(Refer to Appendix B for other preparations to be made prior to contacting the Integrity Officer).

- 8.1.5 The whistleblower may be asked to provide further clarifications and information from time to time, for example, if an enquiry or investigation is conducted.
- 8.1.6 In respect of an employee who reports a suspected violation in good faith and is not engaged in questionable conduct, the Company will make attempts to keep its discussions and actions confidential to the greatest extent possible.
- 8.1.7 However, there may be circumstances where the employee may be needed as a witness. Should this be the case, HeiTech will discuss the matter confidentially with the employee, at the earliest opportunity. In addition, in the course of the investigation, the Company may need to share information with others on a “need to know” basis.

8.2 SCREENING

- 8.2.1 The Integrity Officer will screen and assess the whistleblower’s disclosure to determine the following:
 - a. it is related to a wrongdoing as stated in paragraph 6.1; or
 - b. excluded from the scope of the Whistleblowing Policy and Guidelines, and will prepare general recommendations to the Integrity & Whistleblowing Board Committee.
- 8.2.2 This initial process in 8.2.1 should not take more than one (1) month from the day the Integrity Officer receives the whistleblower’s disclosure. The process may start on immediate basis if the wrongdoing is capable of causing irreparable harm to HeiTech.
- 8.2.3 If the whistleblower’s disclosure involves the Integrity Officer or members of the Management Integrity Committee, the alleged wrongdoer or any other implicated persons will be excluded from performing the activities of screening, action, investigation and recommendation described in this Guideline.

8.3 PRELIMINARY ACTION

8.3.1 The Integrity & Whistleblowing Board Committee together with the general recommendations made by Integrity Officer, will make decisions including but not limited to any of the following:

- a. Rejection of the whistleblower's disclosure;
- b. Directing investigation by the Integrity Officer or any other inside/outside party;
- c. Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the Human Resource Disciplinary Policy and Procedures to facilitate any fact-finding or to avoid any employee's exposure to a threat or harm; and
- d. Referral to the appropriate enforcement authority.

8.3.2 All decisions made and reasons for action thereof shall be documented. Records are kept confidential by the Integrity Officer. Only Board and Integrity & Whistleblowing Board Committee members shall have access to the records.

8.3.3 Subject to legal constraints, the whistleblower will be notified of the status of his or her whistleblower's disclosure based on the preliminary action taken by the Governance & Integrity department as far as reasonably practicable.

8.3.4 The alleged wrongdoer will also be informed of the allegations and given an opportunity to answer the allegations at the investigation, if any, as stated in Paragraph 8.4 - investigation, where deemed appropriate by the Integrity & Whistleblowing Board Committee.

8.4 INVESTIGATION

8.4.1 The investigation would be carried out under the terms of strict confidentiality, by not informing the subject of the whistleblower's disclosure and identity (if known) to any other party other than the Integrity & Whistleblowing Board Committee until (or if) it becomes necessary to do so.

8.4.2 The whistleblower and the alleged wrongdoer are expected to give their full cooperation in any investigation or any other process carried

out pursuant to this Guideline and/or the Disciplinary Policy and Procedure of the Human Resource.

8.4.3 In the event the whistleblower is implicated or discovered to be or have been involved in any wrongdoing, he or she may also be investigated to complete the fact-finding process in accordance with this Guideline and/or the Disciplinary Policy and Procedure of the Human Resource.

8.4.4 If the alleged wrongdoer or any other implicated persons has/have, or is/are found to have:

- a. committed a wrongdoing; or
- b. taken serious risks which would likely cause a wrongdoing to be committed;

The action to be taken against that alleged wrongdoer or any other implicated persons will be determined based on the Disciplinary Policy & Procedure of the Human Resource, which may include formal warning or reprimand, demotion, suspension or termination of employment or services with HeiTech.

8.4.5 The Integrity & Whistleblowing Board Committee, will have the final decision on whether to pursue any or all of the actions identified below:

- a. Disciplinary Action;
- b. Legal action; and/ or
- c. Report to the enforcement agencies.

8.4.6 Investigation outcome as per 8.4.4 and decision as per 8.4.5 will be documented and communicated to the Human Resource Department.

The Human Resource Department must update the Integrity Officer on status of Disciplinary Action for Quarterly Report to the Integrity & Whistleblowing Board Committee.

8.5 REPORTING OF OUTCOME

8.5.1 As per 8.4.6, the disciplinary action process will take place and will be executed by the Human Resource Department and legal action shall be executed by Legal Department (when required).

8.5.2 In the event there are on-going cases, the Integrity Officer shall furnish a status update to the Integrity & Whistleblowing Board Committee.

High-level statistical update shall be made to the Management Integrity Committee meeting.

- 8.5.3 Records of whistleblowing is a confidential document; to be kept by Integrity Officer and only the Integrity & Whistleblowing Board Committee and Board shall have access.

9.0 EXTERNAL DISCLOSURE

- 9.1 The whistleblower has the right to make external disclosure, in the event, the whistleblower is dissatisfied with the actions taken by HeiTech in accordance with policy and guidelines. By external disclosure, it is meant that the whistleblower may choose to report the matter to the relevant governmental authorities i.e. Malaysian Anti-Corruption Commission as deems fit.

However, HeiTech would like to advise the whistleblower to allow, the Integrity Officer and the Integrity & Whistleblowing Board Committee, to complete its course of actions, first.

- 9.2 Whilst the whistleblower is able to report issues externally, the whistleblower must be aware that there is a difference between reporting internally to the Integrity Officer of HeiTech, and externally. To report internally, the whistleblower must have reasonable suspicion that there is evidence of malpractice, whereas to report externally, the whistleblower must have reasonable belief that malpractice has or is taking place and some offer evidence to support the report.
- 9.3 The whistleblower should minimise the possible impact of his or her actions to HeiTech and to the people involved. The external party that the whistleblower considers disclosing information to, should be a party which will be able to effectively organise action against the alleged contravention.
- 9.4 A whistleblower that makes an external complaint in good faith to any of the relevant governmental, regulatory authorities and enforcement agencies in Malaysia or in the country concerned after exhausting HeiTech's procedure, will not be protected under this Whistleblower Policy and Guidelines. The whistleblower will be protected and governed under the Whistleblower Protection Act 2010 (WPA) instead.

10.0 PROTECTION

- 10.1 Upon making a disclosure in good faith, based on reasonable grounds and in accordance with the procedures pursuant to this Guideline:
- a. the whistleblower's identity will be protected i.e. kept confidential unless otherwise required by law or for purposes of any proceedings by or against HeiTech.
 - b. the whistleblower will be protected from harassment or victimisation within HeiTech and its subsidiary companies as a direct consequence of his or her disclosure.
- 10.2 HeiTech will not tolerate punishment or unfair treatment when concerns are raised in good faith. Any employee who reports a contravention or a concern will be given protection and shall in no way be put at a disadvantage as a result of his or her report.
- 10.3 Where it is determined that there is a prima facie case that the whistleblower has suffered adverse treatment, harassment or victimisation as a result of his or her disclosure, a further investigation may take place and disciplinary action may be taken against the perpetrator in accordance with the relevant procedure in this Guideline and/or the Disciplinary Action of the Human Resource Guidelines and Procedures.
- 10.4 If the complaint was made by the whistleblower with malicious intent or with the intent to tarnish the integrity of anyone, the whistleblower will automatically lose the protection as stated in paragraph 10.1. In addition, HeiTech will determine the action to be taken which may include disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services with HeiTech in accordance with Disciplinary Policy and Procedure of the Human Resource.

Note: Please also refer to anti-retaliation policy in HeiTech Anti-Bribery and Corruption Policy.

11.0 TIME LIMITS AND RETENTION OF RECORDS

The Governance and Integrity Department will retain for a minimum period of seven (7) years all records ("Record of Whistleblowing") relating to any whistleblowing case(s) and its related investigation report, if any.

12.0 CIRCULATION AND REVIEW

- 12.1 The Whistleblower Policy and Guidelines will be informed and made available to all employees of HeiTech and its subsidiary companies.
- 12.2 The Whistleblowing Policy and Guidelines will be made available in HeiTech's website for external parties.
- 12.3 The Whistleblower Policy and Guidelines will be reviewed at least once in 3 years by the Governance & Integrity department or upon the request of the Integrity & Whistleblowing Board Committee or the Main Board.
- 12.4 This policy must be reviewed as and when there are changes to act, laws and legislations which affecting the policy.

13.0 PRIVACY

- 13.1 HeiTech is committed to protecting the privacy of the persons involved to the fullest extent possible and in accordance with applicable laws and regulations. Any personal data obtained, as part of this Guideline will only be used for the purposes explained in this Guideline and will only be provided to those who have a need to know about these data for these purposes or to comply with the law or important public interest.

END

PART C

PART C
APPENDICES

APPENDIX A: WHISTLEBLOWER HOTLINE

The HeiTech Whistleblowing Channel is a communication channel to receive and report any wrongdoings as prescribed in paragraph 6.1.

The particulars of the HeiTech Whistleblowing Channel are as below:

Integrity Officer	IZANE BIN ISMAIL Level 7, Menara HeiTech Village Persiaran Kewajipan USJ 1 UEP Subang Jaya 47600 Selangor Darul Ehsan Malaysia
Hotline number	Fixed Line : 03-8601 3355 Mobile phone : 019-354 5454
Offering hours	9.00 am to 6.00 pm on Mondays to Fridays. (Excluding public holidays)
Dedicated Email	htpwhistleblowing@gmail.com

Integrity & Whistleblowing Board Committee Chairman	RAZALEE BIN AMIN
Email	ra@razaleeco.com.my

Preparation required

Prior to calling the Hotline

To accomplish an effective call reporting (as stated in paragraph 8.1 – initial step) you are expected to prepare the following information prior to calling the hotline:

- i. Nature of the wrongdoing to be reported
- ii. The date of the wrongdoing took place
- iii. Time and place of its occurrence
- iv. The identity of the alleged wrongdoer
- v. Particulars of witnesses, if any
- vi. Particulars or production of documentary evidence, if any; and
- vii. Other details deemed to be useful to facilitate preliminary screening and action to be carried out under paragraph 8.2 and 8.3, if required.

APPENDIX C: PROCESS FLOW IN HANDLING DISCLOSURE FROM WHITSLEBLOWER

