



(REGISTRATION NO. COMPANY NO. 200401016536/ 655039-U)

## WHISTLE BLOWING POLICY

## 1. **Policy Statement**

1.1 The Board of Directors (“the Board”) of VentureTECH Sdn. Bhd. (“**VentureTECH**”) is committed to the highest standard of integrity, openness and accountability in the conduct of its businesses and operations. As prescribed under Guidance 3.2 of the Malaysian Code on Corporate Governance, the Board should: -

- (a) encourage Employees (as defined herein) to report genuine concerns in relation to breach of a legal obligation (including negligence, criminal activity, breach of contract and breach of law), miscarriage of justice, danger to health and safety or to the environment and the cover-up of any of these in the workplace; and
- (b) ensure that its whistleblowing policies set out avenues where legitimate concerns can be objectively investigated and addressed.

1.2 This Whistleblowing policy (“**this Policy**”) provides: -

- (a) a set of procedures available to the Whistleblower (as defined herein) to disclose any improper conduct in accordance with the procedures as provided for under this Policy without being subject to victimization, harassment or discriminatory treatment;
- (b) an alternative avenue for the Whistleblower to raise concerns if the normal lines of communication are not available; and
- (c) protection for the Whistleblower who report such allegations provided such disclosure is made in good faith.

1.3 The Policy is designed to: -

- (a) be committed to VentureTECH business ethics of honesty, integrity, accountability and transparency;
- (b) provide a transparent and confidential process for all parties to give information on non-compliances to the Code of Business Conduct (as defined herein) or any misconduct regardless of his or her position, to a relevant party to investigate the allegations and take the appropriate actions; and
- (c) uphold the moral duty being a Company by protecting the interest of all its stakeholders.

1.4 This Policy should be read together with enumerations encapsulated in the relevant legislative and regulatory promulgations including but not limited to the following: -

- (a) Whistleblower Protection Act 2010; and
- (b) Malaysian Anti-Corruption Commission Act 2009.



1.5 Where there is a conflict between the contents of this Policy and the laws and regulatory promulgations, the relevant enumerations contained in the legislations and regulations shall prevail.

**2. Applicability of the Policy**

2.1 This Policy shall include, but not limited to, individuals employed, engaged and/or directed by VentureTECH in any manner to represent the business of VentureTECH which shall include, but not limited to, the following: -

- (a) Directors and Employees of VentureTECH (whether full-time, part-time, contract or temporary);
- (b) Business Associates and other parties providing goods and services to or on behalf of VentureTECH;
- (c) any other person associated with VentureTECH and/or representing VentureTECH or involved with VentureTECH in any transaction.

**3. Definitions**

**Audit Committee** : means a selected number of members of the Board, consisting the Designated Recipient (as defined herein);

**Business Associates** : means an external party with which or whom VentureTECH has, or intends to establish a business relationship, which shall include, but not limited to, advisors, agents, contractors, sub-contractors, consultants, senior associates, consortium partners, joint venture partners, investees, representatives, service providers, suppliers, vendors and any associations, bodies or entities formed by law, wherever located;

**Code of Business Conduct** : means the Code of Business Conduct of VentureTECH, as may be amended from time to time;

**Designated Recipient** : collectively means: -

- (a) Chairman of VentureTECH;
- (b) representative of Economic Planning Unit, Prime Minister’s Department; and

(c) representative of Malaysian Industry-Government Group for High Technology (MIGHT).

- Employees** : Employees shall encompass all personnel including Senior Management (as defined herein), managers, supervisors, executives and non-executives under the employment of VentureTECH. This also covers temporary staff and interns;
- IGU** : means Integrity and Governance Unit of VentureTECH;
- Senior Management** : means the Senior Management of VentureTECH comprising of MD/CEO, Senior Vice Presidents, Vice Presidents and Assistance Vice Presidents;
- Whistle-blower** : means any person or group of persons who submits the Whistleblowing (as defined herein) report via the channels outlined in this Policy; and
- Whistleblowing** : means disclosures made in good faith on any actual, suspected or anticipated mismanagement, corruption, illegality or some other wrongdoings within VentureTECH. Such good faith must not be made recklessly, maliciously and/or for personal gain.

#### 4. **Purpose**

4.1 The purpose of this Policy is to: -

- (a) encourage all persons as stipulated in paragraph 2 to make a disclosure on Whistleblowing of which they become aware and to provide protection to the Whistle-blower who report allegations of such malpractice or misconduct ;
- (b) provide guidance to VentureTECH in managing any information as disclosed by the Whistle-blower and ensuring the confidentiality and the protection of Whistle-blower who raise genuine concerns in good faith under this Policy.

#### 5. **Monitoring and Review of this Policy**

5.1 **IGU shall maintain a register for all disclosures made pursuant to this Policy. All documents obtained pertaining to disclosure shall be considered as “Confidential Information” and be stored securely as enumerated under Section 9 of the Personal Data Protection Act 2010 (“PDPA”). This disclosure shall be kept under the custody of the IGU for six (6) years, or longer as may be decided by the Audit Committee.**

5.2 In adherence to Section 10 of the PDPA, the disclosures shall not be kept longer than necessary. The IGU shall undertake reasonable steps to ensure the disclosures are destroyed or permanently deleted after the period as stipulated in paragraph 5.1 above.

5.3 The IGU shall monitor the implementation and understanding of this Policy.

5.4 VentureTECH shall communicate its Whistleblowing Policy to the persons as stipulated in paragraph 2.1 herein.

## 6. **Whistleblowing Procedures**

### 6.1 Reporting Channel

Anyone who intends to express a concern involving accounting, controls, auditing matters, or non-compliance of laws/regulations and/or internal controls of VentureTECH may do so by telephone, email or in writing to any of the following channel: -

(a) report to IGU as follows: -

VentureTECH  
C-00-01, Ground Floor,  
iTECH Tower,  
Jalan Impact, Cyber 6,  
63000 Cyberjaya,  
Selangor.

Attention: Integrity and Governance Unit

Telephone No.: 03-8322 8611  
Email: igu@venturetech.my

Sample of report as provided in Appendix 1.

(b) filling the Whistleblowing Form at <https://whistleblowing.venturetech.my/>

The disclosure made pursuant to this paragraph will be directed to the Designated Recipient and only the Designated Recipient has access to such disclosure.

### 6.2 Investigations

(a) Once the report pertaining to Whistleblowing is made, the IGU shall immediately within the next seven (7) days contact the Whistle-blower to obtain further information to ascertain the matter and for discussion with the Audit Committee.

(b) The Whistle-blower will be informed within fourteen (14) working days whether an investigation will be carried out or otherwise; and if it is, the Whistle-blower will also be informed about the intended investigation plan.

- (c) An investigation may include internal reviews, reviews by external auditors, lawyers or some other external body as deemed necessary and in accordance with the Discretionary Authority Limits of VentureTECH. The investigation team shall comprise, but not limited to, the IGU officers and any person appointed by the Chairman of the Audit Committee, internally or externally, who is deemed to be trustworthy, honest and objective in getting right and accurate information.
- (d) Once the investigation is completed, the representative from the investigation team will report its decision to the Audit Committee.
- (e) Thereafter the Whistle-blower will be informed of the result of the investigation and its conclusion as well as any corrective measures being taken.

Summary of the procedures as provided in Appendix 2.

## 7. **Safeguards**

All reasonable steps shall and will be taken to protect the anonymity and confidentiality of the Whistleblower. However, under certain circumstances that may require the Whistleblower to assist with the investigation, the individual's identity may become known or needs to be revealed and this shall be done only on need basis, and the Whistleblower's identity will be revealed only to a few selective persons only.

## 8. **Anonymous Whistleblower**

Any disclosure made anonymously will not be entertained. Those who wishes to make a report on Whistleblowing must disclose his/her identity to VentureTECH for VentureTECH to grant the necessary protection to him/her. However, VentureTECH reserves its right to investigate into any anonymous disclosure.

## 9. **Legal Action**

If the allegation in respect of the Whistleblowing is substantiated, appropriate action will be taken against the alleged party, up to and including termination of employment or termination of contract.

Any act of retaliation or victimization against the Whistleblower will result in disciplinary action, up to and including termination of employment or termination of contract.

Any report or allegation made under this Policy shall be made in good faith, devoid of any malicious intent. Any abuse of this Policy will be dealt with seriously.

Any person who believes that he/she is being penalized in any way for acting under this Policy or who believes that there has been cover up of the action disclosed or is not satisfied with the response to his/her disclosure, may raise the concerns directly to the Chairman of VentureTECH at the following address: -

VentureTECH  
C-00-01, Ground Floor,  
iTECH Tower,  
Jalan Impact, Cyber 6,  
63000 Cyberjaya,  
Selangor.

Attention: Chairman of VentureTECH

**10. Amendments**

This Policy, which accords in the spirit with the requirements of the relevant legislations and regulatory promulgations, shall be reviewed, at the Board's discretion, and amended from time to time, as and when necessary. Changes to this Policy, if any, shall only be made with the Board's approval in writing.



**Appendix 2**

**WHISTLE-BLOWER REPORT FORM**

The following is a sample of Whistle-blower Report Form. You can follow this as a guideline.

|  |  |                 |  |
|--|--|-----------------|--|
| <b>REPORTER'S CONTACT INFORMATION</b><br><i>(This section may be left blank if the reporter wants to be anonymous)</i> |  |                 |  |
| NAME   |  |                 |  |
| DESIGNATION  |  |                 |  |
| DEPARTMENT / OPERATION   |  |                 |  |
| CONTACT NUMBERS  |  |                 |  |
| E-MAIL ADDRESS   |  |                 |  |
| <b>SUSPECT'S INFORMATION</b>   |  |                 |  |
| NAME   |  |                 |  |
| DESIGNATION  |  |                 |  |
| DEPARTMENT / OPERATION   |  |                 |  |
| CONTACT NUMBERS  |  |                 |  |
| E-MAIL ADDRESS   |  |                 |  |
| <b>WITNESS(ES) INFORMATION <i>(If any)</i></b>   |  |                 |  |
| NAME   |  | NAME            |  |
| DESIGNATION  |  | DESIGNATION     |  |
| DEPARTMENT   |  | DEPARTMENT      |  |
| CONTACT NUMBERS  |  | CONTACT NUMBERS |  |
| E-MAIL ADDRESS   |  | E-MAIL ADDRESS  |  |
| ALLEGATION NO.   |  | ALLEGATION NO.  |  |

|  |
|--|
| <b>COMPLAINT:</b> <i>Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.</i> |
| 1. What misconduct / improper activity occurred?   |
| 2. Who committed the misconduct / improper activity?   |





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|   |            |
|---|------------|
| 3. When did it happen and when did you notice it?   |            |
| 4. Where did it happen?   |            |
| 5. Is there any evidence that you could provide us?*  |            |
| 6. Are there any other parties involved other than the suspect stated above?                |            |
| 7. Do you have any other details or information which would assist us in the investigation? |            |
| 8. Any other comments?  |            |
| Date:   | Signature: |



Appendix 2

**Summary of the Procedures – Whistleblowing Policy**

