

# MyTech (Malaysia) Berhad (formerly known as Widetech (Malaysia) Berhad)

# **Whistleblowing Policy**

#### I. Purpose

This Whistleblowing Policy ("Policy") is designed to encourage employees of MyTech Group Berhad (formerly known as Widetech (Malaysia) Berhad) ("the Company" or "MyTech" together with its subsidiaries, the "Group"), business associates (e.g. customers, suppliers, etc., who deal with the Company) and members of the public to raise concerns, in confidence, about misconduct, malpractice or irregularity in any matter related to the Company.

## This Policy is designed to:

- (a) Promote and maintain high transparency and accountability in the workplace;
- (b) Promote good corporate governance practices in the work place;
- (c) Ensure that stakeholders can raise concerns without fear of reprisal and safeguard such person's confidentiality;
- (d) Protect the whistleblower from reprisal as a consequence of making a disclosure;
- (e) Provide a transparent and confidential process for dealing with concerns;
- (f) Protect the long-term reputation of MyTech;
- (g) Support MyTech's values; and
- (h) Maintain a healthy working culture and efficient company.

#### II. Responsibility to Report

The Code of Ethics of MyTech ("COE") provides the guiding principles for all Board members and employees to take the right action, behave with integrity and honesty, treat people fairly, respect diversity, obey all laws, accept accountability, communicate openly, and always behave in a way that is beyond reproach.

Under the COE, employees are required to promptly alert their supervisor or higher management of business and work-related situations that could be damaging to MyTech or cause harm to others such as emergency, crime, accident, irregularity or other unexpected event; and to take reasonable action to prevent damage or harm. Employees could be in breach of the COE if they assist or authorize others in activities that breach the COE, conceal or fail to report any known or suspected breaches by others. Employees and business associates may also have a duty to report corruption to the authorities if required to do so by local regulations.

#### III. Protection

Persons making genuine and appropriate complaints under this Policy are assured of fair treatment. In addition, MyTech Group's employees are also assured of protection against unfair dismissal, victimization or unwarranted disciplinary action, even if the concerns raised turned out to be unsubstantiated. MyTech Group reserves the right to take appropriate actions against anyone (employees or business associates) who initiates or threatens to initiate retaliation against those who have raised concerns under this Policy. In particular, employees who initiate or threaten retaliation will be subject to disciplinary actions under the COE, which may include dismissal. Management will support all employees and encourage them to raise concerns without fear of reprisal.

## IV. Confidentiality

MyTech Group will make every effort, within its capacity to do so, to keep a Whistleblower's identity confidential. MyTech Group will endeavor to advise a Whistleblower in advance if his or her identity may become apparent or needs to be disclosed. Should an investigation lead to a criminal prosecution, it may become necessary for a Whistleblower to provide evidence or be interviewed by the relevant authorities.

## V. Types of Misconduct, Malpractice and Irregularity

It is not possible to give an exhaustive list of the activities that constitute misconduct, malpractice or irregularity covered by this Policy. For example, MyTech Group expects all employees to observe and apply the COE principles in the conduct of MyTech Group's business. Employee behaviour that is not in line with COE principles could constitute a misconduct, malpractice, or irregularity that should be reported. The principles of COE relate to:-

- integrity and honesty
- confidentiality
- avoiding conflicts of interest
- responsibilities
- safety, health and environment
- compliance with financial controls and reporting requirements
- moderation in gifts
- compliance with laws and regulations
- protecting our information, records and assets
- compliance with the code and obligation to report

## VI. Reporting and Investigation

## a) Reporting Channel

All Employees may report any potential or actual misconduct, malpractice or irregularity to the Audit Committee (AC) Chairman. The report must be in writing, submitted via post or email to the address stated in **Section X** below of this Policy.

## b) Reports and Supporting Documentation

While MyTech Group does not expect the Whistleblower to have absolute proof or evidence of the misconduct, malpractice or irregularity reported, the report should show the reason for the concern and full disclosure of any relevant details and supporting documentation. If he/ she makes a report in good faith then, even if it is not confirmed by any subsequent investigation, the Whistleblower's concern would be valued and appreciated.

All complaints will be treated strictly private and confidential.

## c) Investigation

Every report or complaint received will be assessed.

If there is sufficient evidence to suggest that a case of possible criminal offence or corruption exists, the matter will be reported and addressed to the relevant authority accordingly.

A full report on the investigation conducted without revealing the identity of the Whistleblower. For confirmed cases of COE violations, the normal process is for the AC to determine what disciplinary action is appropriate and make a recommendation to the AC Chairman for final decision.

## VII. False Report

If a Whistleblower makes a false report maliciously, with an ulterior motive, or for personal gain, MyTech Group reserves the right to take appropriate disciplinary actions.

# **VIII. Anonymous Reports**

As MyTech Group takes reporting of misconduct, malpractice, and irregularity seriously and wants to conduct warranted investigations of both potential and actual violations, it is preferred that these reports are not made anonymously.

## IX. Responsibility for Implementation and Review of Policy

This Policy has been approved and adopted by the Board of directors of the Company. The AC has been delegated overall responsibility for implementation, monitoring and periodic review of this Policy and any matter raised must be put forward to the Board for approval. The Policy is reviewed periodically to assess its effectiveness, and in any event, at least once every 3 years.

## **X.** Disclosure Procedure

1. All complaints/ disclosures should be addressed/ reported to:-

Name : MR LIM SZE YEAN

Email : sylim@mytechgroup.com.my

Mailing Address: MyTech Group Berhad, K-09-01, No. 2, Jalan Solaris, Solaris Mont'

Kiara 50480 Kuala Lumpur, Malaysia.

- 2. If any individual believes reasonably and in good faith that improper conduct or malpractice exists within MyTech, the individual may make a disclosure of improper conduct and immediately report the information to the above contact person. Information should be reported as soon as the individual becomes aware of the facts that are the basis of the potential irregularity or complaint. An individual reporting such information should be prepared to provide as much information as possible to ensure that the matter can properly be investigated.
- 3. The AC Chairman receiving the report will then immediately convene a meeting with the Audit Committee to conduct a preliminary assessment on the matter. If preliminary assessment shows that valid or potential concern fall within the whistleblowing reportable concerns, then further investigation shall be carried out either by the AC with the assistance of independent department/ personnel of the Company or by AC enlisting assistance of outsourced independent professional firm.
- 4. No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy.
- Any individual within MyTech who retaliates against another individual who has reported a violation in good faith or who, in good faith, has cooperated in the investigation of a violation is subject to discipline, including termination of employment or contract for services.
- 6. As provided by law, an individual may also report illegal or unethical practices directly to statutory bodies such as the Malaysian Anti-Corruption Commission, the Securities Commission, Bursa Malaysia, the Royal Malaysian Police or other similar government agencies in other countries. In such an event, protection of the whistleblower is also provided under the respective laws such as the Whistleblower Protection Act 2010.