



GHL Systems Berhad (199401007361)
Incorporated in Malaysia

GHL GROUP WHISTLE BLOWING POLICY

28 MARCH 2022

1. INTRODUCTION & OBJECTIVE OF THE POLICY

At GHL Systems Berhad and its group of companies (“GHL”), we expect and are committed to conducting our business with the highest standards of professionalism and ethics in the conduct of our business and professional activities. The Board of Directors wishes to provide all directors, management staff, employees, shareholders of GHL, as well as GHL’s customers, partners, merchants, vendors, government intermediaries and etc. (“External Third Parties”) with an independent and unbiased mechanism to bring to the attention of Board of Directors any concerns of integrity and misconduct as well as to enable Board of Directors to be informed at an early stage of any misconduct or improprieties.

GHL expects the highest standards of integrity from all of its directors, senior management, employees, shareholders and all of its External Third Parties. GHL takes a serious view of any misconduct/by its directors, management staff, employees, shareholders and External Third Parties, in particular with respect to their obligations to GHL's interests.

This policy statement on whistle-blowing (“**Policy**”) is aimed to:

- develop a culture of openness, accountability and integrity within GHL
- provide a consistent, systematic, corporate-wide process for managing any actual or potential improper conduct
- encourage all directors, senior management, employees, shareholders and External Third Parties to raise genuine concerns suspicious circumstances as early as possible, knowing that their confidentiality will be respected and that their identity will remain anonymous
- reassure all directors, senior management, employees, shareholders and External Stakeholders that they should be able to raise genuine concerns without fear of reprisal, even if they turn out to be mistaken.

2. TYPES OF WRONGDOINGS

Only genuine concerns of a serious or sensitive nature should be reported under the whistleblowing procedures as stipulated under this Policy. Any whistle-blowing complaint should be made in good faith with a reasonable belief that the information relating to the same is substantially true, and not for personal gain. A complaint can be made even if a whistleblower is not able to identify a particular person to which the improper conduct is attributable.

Complainant can report a whistle-blowing incident if he/she is aware of any misconduct or wrongdoing, including but not limited to the following:

- Suspected Criminal Offence
- Non-compliance with Regulatory Requirements and/or Group Policies
- Fraud / Money laundering / Corruption/Bribery
- Misappropriation of assets / Theft / Embezzlement
- Sexual harassment / Bullying
- Financial and/or Professional Misconduct / Negligence
- Unfair Treatment

- Improper Conduct / Unethical Behaviour / Dishonesty
- Receiving / Soliciting Graft / Kickbacks
- Misuse of confidential information / Misuse of company properties
- Abuse of authority / Impersonating of officials
- Attempts to suppress or conceal any information relating to any of the above

The above list is not exhaustive and additionally includes any act or omissions, which if proven, will constitute an act of misconduct under GHL's Anti Bribery and Corruption Policy or any criminal offence under any relevant Legislations or Acts of a particular jurisdiction.

3. WHISTLE-BLOWING CHANNELS

A complaint or report can be made via the following:

Email: wb@whistleblowerghl.com

The whistle-blowing channel above is secure and accessible only by Audit and Risk Committee members, Legal, Compliance and Sustainability Department and Internal Audit Department ("**GHL WhistleBlower Committee**").

4. DISCLOSURE REQUIREMENTS

A complaint or report shall be made and submitted together with the following information:

- Details of complainant (strongly encouraged even though Whistle-blower may choose to remain anonymous)
- Type of activity/conduct
- Details of suspected personnel involved
- Particulars of witnesses (if any)
- Details of incident (including date, time, and location of incident)
- Any supporting/documentary evidence

5. PROTECTIONS OF WHISTLEBLOWERS

Pursuant to the Whistleblower Protection Act 2010, the following protections will be accorded to a whistleblower who makes a disclosure of improper conduct to GHL in good faith:

- confidentiality of identity
- immunity from civil and criminal liability for the disclosure made
- protection from detrimental actions such as dismissing or threatening to dismiss the whistleblower
- taking disciplinary actions, suspending, or threatening to discipline or suspend the whistleblower
- subjecting the whistleblower to any form of harassment or abuse
- imposing any penalty, directly or indirectly, on the whistleblower

6. CONFIDENTIALITY

All whistleblowing complaints will be investigated and the identity of the whistleblower, if known, will be fully protected. All information in respect to the complaints received will be treated as confidential and will not be disclosed without the written consent of the whistleblower, save to the extent permitted by law or required for the purposes of making a report to the relevant authorities. The identity of parties reporting a Whistle-blowing complaint will be kept confidential and protected. Whistle-blowers are protected under the Laws of Malaysia Act 711: The Whistle-blower Protection Act 2010. However, the person making anonymous report will be advised that maintaining anonymity may hinder an investigation.

7. ACTING IN GOOD FAITH

The Company expects all parties to act in good faith and have reasonable grounds when reporting a Whistle-blowing complaint.

8. PROTECTION FROM RETALIATION

Any party that attempts to retaliate, victimize or intimidate anyone who has reported a wrongdoing in good faith shall be dealt with serious disciplinary actions and procedures, up to and including legal action, where applicable.

9. INVESTIGATING PROCEDURES

Reports will be reviewed jointly and promptly by the **GHL Whistle Blowing Panel** (“said Panel”) which may consist the Chairman of the Audit Committee, the Group Chief Executive Officer, the Group Head Human Resource and the Group Head Legal Compliance & Sustainability insofar as they are not the subject of the investigation.

The said Panel may then convene an **Independent Investigation Panel** to conduct a full investigation should it conclude the necessity of such a panel upon completion of a preliminary investigation.

If so required, the **GHL Whistle-Blowing Panel** may obtain the assistance from other resources within GHL to further investigate the complaints or reports in accordance with the following procedures:

- Upon receipt of a complaint, the said Panel will, conduct an initial enquiry of the complaint to determine its genuineness and the seriousness of the concern or allegation which has been raised.
- If the initial enquiry made by the said Panel indicates that the complaint has no basis or merits or it is not a matter to be dealt with under this Policy, it may be dismissed by the said Panel and no further action shall be taken.
- If the initial enquiry indicates that further investigation is necessary, the said Panel will immediately convene an Independent Investigation Panel (“IIP”) to carry out a thorough investigation into the complaint. Such investigation will be conducted in a

fair manner as a neutral fact-finding process and without any presumption of guilt.

- The said IIP shall have the right to ask for any information and documents and to examine any employees of GHL or any other person(s) as it may deem appropriate for the purposes of conducting its investigation. The results of the initial enquiry by the said IIP and the further investigation (if any) will be reported to said Panel and thereafter the said Panel shall report to the Board of Directors as the case may be after investigations for any improper conduct and to ensure appropriate action is taken to address such misconduct.

10. REVERTING TO COMPLAINANT

GHL reserves the right not to inform the whistle-blower of the status of report, and/or the precise action plan and outcome of the investigation, as this may infringe a duty of confidentiality.

11. CONSEQUENCES OF WRONGDOINGS

GHL's Board of Directors and Senior Management Team in particular the Group Human Resources Department will take serious and consistent action against any party who is determined to have acted in violation of this policy including but not limited to:

- reprimand, take disciplinary action, impose punishment as appropriate
- termination or suspension of employment
- report to the relevant authorities (if applicable)
- any other action deemed appropriate by the Board of Directors.

Approved by the Board on **28th March 2022**

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