

WHISTLEBLOWING POLICY

Introduction

G3 Global Berhad (“**the Group**”) recognizes whistleblowing as an important mechanism in the prevention and detection of any Improper Conduct in its businesses operations.

In line with this, the Whistleblowing Policy is established and designed to encourage all Directors, Employees, Business Partners as well as other external parties (including customers of the Group) to raise their concerns and further disclose any Improper Conduct or the inadequacies of the Group’s Anti-Bribery and Corruption (“**ABC**”) programme which they have become aware of.

All Directors, Employees, Business Partners and other external parties should also have the assurance that any genuine reports or disclosures made in good faith with respect to Improper Conduct or the inadequacies of the Group’s ABC programme are to be raised without fear of reprisals and detrimental actions by the Group.

Scope of Policy

The Whistleblowing Policy applies to all Directors, Employees, Business Partners and other external parties.

The Whistleblowing Policy covers the reporting process, confidentiality as well as protection to the Whistleblower.

Definitions

Business Partners are defined as “anyone regardless of whether in the form of a company or a person who have any business dealings with the Group and/or performs services for and on behalf of the Group and include agents, contractors, sub-contractors, joint venture partners, consultants, lawyers, auditors, accountants etc.”

Improper Conduct includes, but not limited to the following:

- Corruption, bribery and fraud;
- Theft or embezzlement;
- Criminal offences or any breach of the laws of Malaysia;
- Failure to comply with the Group’s policies and procedures;
- Abuse of power;
- Acceptance of gifts/favour beyond the threshold allowed by the Group;
- Misuse and/or misappropriation of the Group’s fund or assets;
- Impropriety (including financial and operational, etc) within the Group;
- Gross management within the Group (including serious potential breach to the interest of society and environment);
- Breach of Code of Conduct of the Group, including sexual, physical or other abuse of human rights;
- Act or omission jeopardising the health and safety of the Group’s Directors, Employees, Business Partners or members of the public; and
- Concealment of any of the above.

Whistleblower means a person who discloses information on:

- A person or organization engaged in or suspected of being involved in the alleged Improper Conduct; and/or
- Any inadequacies of the Group's ABC programme.

Whistleblowing means a disclosure regarding Improper Conduct by a person who has reasonable belief that another person has engaged, is engaging or attempting to engage in Improper Conduct; and/or a disclosure regarding any inadequacies of the Group's ABC programme.

Disclosure Methods

The Group provides a number of methods for a Whistleblower to make a disclosure.

Email:	whistleblowing@g3global.com.my
Mail:	To be addressed to one or more of the following persons within the Company: <ul style="list-style-type: none"> (i) Managing Director (ii) Chief Executive Officer (iii) Group Chief Financial Officer (iv) Head of Department (v) Head of Internal Audit (vi) Head of Human Resources & Admin

The disclosure report shall be made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and are not made to seek for any personal gains or for malicious purposes.

The Whistleblower is encouraged to disclose his or her personal information including name and contact details to facilitate the investigation process to be carried out expediently by the Group. Furthermore, the provision of such contact details will also facilitate the process of communicating the findings of the investigation to the Whistleblower.

Nonetheless, the Group **does not in any event prohibit** any genuine anonymous disclosures from being made.

Investigation Process

All complaints or disclosures received will be placed before a Whistleblowing Committee.

For this purpose, the Whistleblowing Committee shall comprise of the following members:

- (i) The Managing Director;
- (ii) An Independent Non-Executive Director; and
- (iii) Any other person who may be invited to join depending on the subject matter of the complaints or disclosures.

The Whistleblowing Committee shall have the authority to:

- (i) Determine the legitimacy and scope of the report/disclosure;
- (ii) Direct further action; and
- (iii) Determine the appointed parties who will be conducting an investigation on behalf of the Company i.e. the management, the Internal Audit Department and/or any other external parties who may be experts in the area.

The appointed parties tasked to investigate (“**the Investigation Team**”) shall take all reasonable steps to ensure that the investigation regarding the report/disclosure are carried out fairly, unbiased and with due regards to the principle of natural justice.

The Investigation Team will keep detailed records of all evidence gathered, interviews conducted and all records / reports and / or documents received / reviewed which may affect the outcome of the investigation.

Upon conclusion of the investigation, the Investigation Team will present the findings of the investigation to the Whistleblowing Committee.

A copy of the Investigation Report (which is sealed) shall be submitted to the Risk Management/Audit Committee for Loss Event Reporting (LER) purposes.

Where the Whistleblowing Committee is satisfied with the findings of the investigation, the Whistleblowing Committee will communicate to management to proceed with its decision based on the Group’s Policies for the necessary actions to be taken immediately including:

- The initiation of legal proceedings by law enforcement officials including but not limited to criminal prosecution under appropriate laws.
- The requirement to provide compensation for any unacceptable use of services.
- Disciplinary sanctions, up to and including termination of employment.

Where the investigation concludes that the disclosed conduct did not occur, communication will be made to report these findings to the Whistleblower.

Preservation of Confidentiality and Protection

The Group will take all reasonable steps to protect the identity of the Whistleblower, in ensuring any reprisals or detrimental actions are not taken against the Whistleblower. Reprisals or detrimental actions may include disciplinary measures, demotion, suspension or termination of employment or service.

In this regard, the identity of the Whistleblower and the information disclosed would be kept confidential to the fullest possible extent in a manner consistent with the need to conduct an investigation, with the exception if the Whistleblower consents to disclosure or if disclosure is otherwise required by law.

The abovementioned protection will be accorded by the Group only when the Whistleblower satisfies all of the following conditions:

- The disclosure is done in good faith;
- The Whistleblower is aware that the information and / or allegation disclosed are true;
- The Whistleblower has not communicated the report / disclosure to any other party not related to the report/disclosure; and
- The report/disclosure made is not for personal gain or interest.

The Group views any false, malicious or defamatory allegations seriously. This can be considered as gross misconduct where appropriate disciplinary actions may be taken by the Group.

Review

This Whistleblowing Policy was approved by the Board of Directors on 26th June 2020 and will be reviewed as and when the need arises to ensure they meet the objectives of the relevant legislation and remain effective for the Group and may be changed, whenever required at the discretion of the Board of Directors.