



AWANBIRU TECHNOLOGY BERHAD
[Reg. No. 201001038336 (922260-K)]
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

Updated as at 27 August 2024

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1. OBJECTIVES

- 1.1 This Whistleblowing Policy aims to establish a robust, transparent, and accountable communication channel for legitimate concerns to be objectively investigated and addressed. Individuals will be able to raise concerns about illegal, unethical, or questionable practices in confidence and without the risk of reprisal.
- 1.2 This Policy shall also be read together with the Group's Anti-Bribery and Anti-Corruption Policy and other related materials on disciplinary action.

In this Policy, "**Group**" means AwanBiru Technology Berhad (Awantec) and its subsidiaries; "**Board of Directors**" means the board of directors of Awantec; "**Policy**" means this Whistleblowing Policy, as may be revised and amended from time to time.

2. SCOPE OF APPLICATION

- 2.1 This Policy applies to all employees of the Group, customers, and any other stakeholders/persons providing services to the Group, including consultants, vendors, independent contractors, external agencies, and/or any other party with a business relationship with the Group.
- 2.2 The scope of this Policy covers the following improprieties: -
 - fraud;
 - misappropriation of assets;
 - sexual harassment;
 - criminal breach of trust;
 - bullying/harassment;
 - illicit and corrupt practices;
 - questionable or improper accounting;
 - misuse of confidential information;
 - acts or omissions which are deemed to be against the interest of the Company, laws, regulations, or public policies;
 - giving false or misleading information (including suppression of any material facts or information);
 - breaches of Group Policies and Code of Conduct (COC); or
 - the deliberate concealment of any of the above matters or other acts of wrongdoings
- 2.3 The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under the Code of Conduct or any criminal offence under relevant legislation in force.

3. OVERSIGHT AND OWNERSHIP OF POLICY

- 3.1 The Legal and Corporate Governance Department is responsible for the administration and interpretation of this Policy.
- 3.2 The Audit Committee retains overall responsibility for the monitoring and effectiveness of this Policy.

4. PROTECTION UNDER THE POLICY

A. Confidentiality and Anonymity

- 4.1 Awantec commits to ensure that all disclosed information, including the identity of the whistleblower, shall be treated with strict confidentiality, to the extent permitted by law and to the extent reasonably practicable to the whistleblower who submitted the whistleblowing reports in good faith, even if the allegations later on prove to be unfounded or mistaken.
- 4.2 The whistleblower will be appropriately protected from internal disciplinary actions (if applicable), dismissal, harassment, victimization or informal pressures.
- 4.3 No protection from internal disciplinary action will be offered if the whistleblowing employee does not adhere to the procedures for whistleblowing and disclosures in this Policy.

B. When Protection May Not Be Available

- 4.4 The Group expects all parties to act in good faith and have reasonable grounds when reporting a whistleblowing complaint.
- 4.5 The Whistleblower protection will be revoked in the following circumstances: -
 - a. if the report of improper conduct is not made in good faith; or
 - b. if the employee him/herself participated in the improper conduct reported; or
 - c. the report of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
 - d. the employee breaches his/her obligations of confidentiality under this Policy.

5. HOW TO RAISE A CONCERN

- 5.1 Whistleblowing complaints will be directed to the Chairman of the Audit Committee and the Company Secretary through the dedicated whistleblowing channels outlined below.

Reporting Mode	Contact Details
Letter	Block 11B, Star Central, Lingkaran Cyber Point Timur, 63000 Cyberjaya, Selangor
Online Submission	Whistleblowing Form
Electronic mail	whistleblowing@awantec.my

- 5.2 Alternatively, the whistle-blower may report directly to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act 2010 such as Bank Negara Malaysia (BNM), Malaysian Anti-Corruption Commission (MACC), Association of Banks Malaysia (ABM), Police, etc.

- 5.3 To facilitate an investigation into the alleged wrongdoing, where possible and applicable, the following information should be included when making a disclosure:

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- a. Brief description of the misconduct;
- b. The date and location of the incidence;
- c. The identity of the wrongdoer;
- d. Particulars of witnesses, if any;
- e. Supporting evidence and/or documents;
- f. Other details deemed to be useful to facilitate screening and action to be carried out.

- 5.4 Where possible, the whistleblower is encouraged to disclose his/her personal details such as (i) full name, (ii) NRIC and/or Employee Number (if applicable), as well as (iii) contact details such as telephone number and email address.

- 5.5 Reports may be made on an anonymous basis. However, natural justice usually requires that the details and identity of the whistleblower submitting the whistleblowing report be disclosed in any disciplinary investigation or action to be taken against the person(s).

- 5.6 Anonymous whistleblowing reports will therefore be considered at the discretion of the Audit Committee. In exercising this discretion, the Audit Committee will consider: -

- a. the seriousness of the issues raised,
- b. credibility of the whistleblowing report, and
- c. likelihood of confirming the allegation from the relevant sources.

6. WHISTLEBLOWING INVESTIGATION

- 6.1 Upon receipt of the whistleblowing report, the Audit Committee will as soon as practicable establish a Whistleblowing Investigation Team comprising appropriate and suitably qualified personnel to investigate the concerns disclosed in the whistleblowing report fairly and objectively and at its discretion, consider involving any other or additional officer of the Company and/or Board Committee and/or an outside agency for the purpose of investigation.
- 6.2 If the outcome results in a proven case of wrongdoing/malpractice and confirms the allegations, disciplinary action shall be instituted against the related employees in accordance with the company's policy including disciplinary action, termination of contract, and establishment of new controls to prevent the recurrence of the wrongdoing or misconduct in with the Awantec Group of Companies.
- 6.3 A member of the Audit Committee or an officer appointed by the Audit Committee will within 10 calendar days, contact the person who submitted the whistleblowing report to: -
- i. acknowledge that the report has been received, and
 - ii. indicate how the report will be dealt with.
- 6.4 The Audit Committee is not obliged to contact the persons who submitted the whistleblowing report anonymously, exclude contact details, or do not report in good faith.
- 6.5 The Audit Committee will keep a record of all steps taken in response to each whistleblowing report received as well as how the concerns raised were resolved.
- 6.6 The Audit Committee will report their findings to the Board of Directors.

7. DISCLOSURE OF THE POLICY

This Policy will be informed and made available to all employees of the Company and its subsidiaries on the Company's website.

8. REVIEW OF THE POLICY

This Policy shall be reviewed periodically by the Board per the needs of the Company from time to time or when changes to regulatory requirements necessitate a revision, but at least once every three years.

<p>Adopted by Board: 20 February 2013 Updated and adopted by Board on: 5 July 2021 Updated and adopted by Board on: 27 August 2024</p>

WHISTLEBLOWING FORM

Denotes mandatory field

Your Contact Information Name*

Name* _____

NRIC No.* _____

Phone No. * Office _____ Mobile _____ Home _____

Email Address* _____

Employment details * _____

Position &
department(for
employees only)

Your Disclosure*

Please include details of the person(s) involved, nature of allegation, where and when the alleged improper conduct took place (use additional sheets if necessary)

Please state the supporting documents, witnesses or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant documents (use additional sheets if necessary)

Declaration*

I hereby declare that all the information given herein are made voluntarily and are true to the best of my knowledge and I will ensure that my participation in this matter will be kept confidential. I do understand that Awantec will use the information and material provided throughout the investigation process.

(Signature*)

Name

Date