

**TECHBOND GROUP BERHAD**  
**FRAUD & WHISTLEBLOWING POLICY**

**1. PURPOSE**

This policy addresses Techbond Group Berhad's (the "Company") commitment to integrity and ethical behaviour by providing an environment where employees can act appropriately without fear of retaliation. The Company encourages its employees who have concerns about suspected serious misconduct or any breach or suspected breach of law, rule or regulations governing the Company and its subsidiaries operations that may adversely impact the Company to come forward and report on their concerns without fear of punishment or unfair treatment.

The Company conducts its business based on the principles of fairness, honesty, professionalism, integrity and respect. It is the Company's policy to support and encourage its employees to report and disclose any incident of fraud, theft, misconduct, corruption, improper or illegal activities and to fully investigate such reports and disclosures.

The Company will address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats, coercion, harassments or intimidation against any employees (the "whistleblowers") who report, disclose or investigate improper or illegal activities and to protect the whistleblowers who come forward to report such activities. Any employee found harassing or retaliating against a genuine whistleblower will be treated as acting in gross misconduct and if proven, may lead to termination. The Company assures that all reports will be treated in the utmost confidentiality and will promptly investigate reports made anonymously, if desired.

Employees are encouraged to use the guidance provided in this policy for reporting all allegations of suspected misconduct or improper activities. This policy however DOES NOT apply to or change the Company's policies and procedures for individual employees grievances or complaints relating to job performance, terms and conditions of employment, which will continue to be administered under the Company's employee handbook.

**2. DEFINITIONS**

**2.1 Misconduct / Improper Activities**

These are not limited to fraud, theft or corruption but also possible misconduct, illegal or bad practices including behaviours not in line with the Company's values and violation of laws, rules and regulations under which the Company operates, violation of the Company's policies, unethical practices, endangerment to public health or safety and negligence of duties.

**2.2 Whistleblower**

This means a person or entity making a protected disclosure about misconduct, improper or illegal activities. A whistleblower may be a director, officer, employee, applicants for employment, vendor, contractors, customers of the Company of the general public at large. The whistleblower's role is that of a reporting party and is not

an investigator or finder of fact nor can they determine the appropriate corrective or remedial action that may be required.

### 2.3 **Good Faith**

Good faith is when a report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true. A report need not be proven true for a report to be made in good faith. Good faith is absent when a report is made maliciously or falsely.

## 3. **WHISTLEBLOWING PROCEDURE**

### 3.1 **General Guide**

This policy presumes that an employee is acting on good faith when reporting on misconduct or improper activities. An employee who knowingly or recklessly makes statements or disclosures that are not done in good faith may be subject to disciplinary actions, which may include termination. Employees who make a whistleblowing report pursuant to this policy will continue to be held to the Company's general job performance standards and adherence to the Company's policies and procedures.

### 3.2 **Reporting Allegations of Misconduct or Improper Activities**

3.2.1 Any person may report allegations of suspected misconduct or breach or suspected breach of law, rule or regulation under which the Company or its subsidiaries operates that may adversely affect the Company, its customers, shareholders, employees, investors or the public at large.

3.2.2 Acts of misconduct or improper activities may be disclosed in writing, telephonically or in person. However, all reports are encouraged to be made in writing so as to assure a clear understanding of the issues raised. *The report format is provided in Appendix 1 and may be used for reporting.*

3.2.3 Whistleblowers are recommended identify themselves and each report will be treated in the utmost confidentiality, though it is not a requirement under this policy.

3.2.4 All reports should be sent directly to any one member of the Whistleblower Committee members who are as follows:

- a. Mr Ooi Guan Hoe; and
- b. Mr Lee Seng Thye

3.2.5 For reports sent through emails, it is recommended that they be marked as "Techbond – Whistleblowing Report" for ease of identification.

3.2.6 Although the whistleblower is not expected to prove the truth of an allegation he/she needs to demonstrate to the person contacted that there are sufficient grounds for concern.

**4. INVESTIGATING ALLEGED MISCONDUCT OR IMPROPER ACTIVITIES**

- 4.1 The Whistleblower Committee member who receives report will notify the sender and acknowledge receipt of the report within five business days.
- 4.2 The Whistleblower Committee will then meet to discuss the action / investigation required based on the report received. The Committee may invite or exclude from its meetings any persons it deems appropriate depending on the nature of the complaint.
- 4.3 The Whistleblower Committee have the responsibility to conduct investigation and involve such other parties as them may consider appropriate. The Committee will ensure that investigations are carried out using appropriate channels, resources and expertise.
- 4.4 Concerns about allegations which fall within the scope of specific policies or procedures of the Company will be referred for consideration under those policies.
- 4.5 The Whistleblower Committee will report to the Board of Directors on a periodic basis about reports received and actions taken. The Board reserves the right to make any decision based on the findings of the Committee.
- 4.6 The identity suspects shall remain confidential until investigations are fully carried out.
- 4.7 Employees who are interviewed or asked to provide information have a duty to fully cooperate with the investigators and must refrain from discussing or disclosing matters concerning to the investigations to the suspect(s), other employees or persons not involved in the matter.
- 4.8 For any reason, the person making the report is not satisfied with the way his/her has been dealt with, he/she can escalate the report to the Chairman of the Company.

This policy is approved by the Board of Directors on 21 February 2019 and implemented on 21 February 2019.

Appendix 1

**WHISTLEBLOWER REPORT FORM**

Please provide the following details for any suspected serious misconduct or any breach or suspected breach of law, rule or regulation that may adversely affect the Company and submit the form directly to any of the Whistleblower Committee members. Please note that you may be called upon to assist in the investigation, if required.

**A. Reporter's Contact Information**

Full Name :  
Department :  
Contact Number :  
e-mail Address :

**B. Suspect's Information**

Full Name :  
Department :  
Contact Number :  
e-mail Address :

**C. Witness(es) Information**

Full Name :  
Department :  
Contact Number :  
e-mail Address :

Full Name :  
Department :  
Contact Number :  
e-mail Address :

**D. Complaint**

*If there is more than one allegation number each allegation and use as many pages as necessary.*

1. What misconduct / improper activity occurred?
2. Who committed the misconduct / improper activity?
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? Please provide details of the other party.
  
7. Do you have any other details or information which would assist us in the investigation?
  
8. Any other comments?

Date:

.....  
Signature

Note: *\*You SHOULD NOT attempt to obtain evidence for which you do not have a right of access. Whistleblowers are 'reporters' and not investigators.*

For Whistleblower Committee Use Only

Report No.
Received by: _____ Date: _____
Acknowledgement sent on: _____
Investigation Required (Yes/No)?( If NO, please state reason)
Investigation Done by: _____
Investigation Results: _____
Action taken / Conclusion: _____
Reported to Board of Directors on: _____
Signed off by Whistleblower Committee Member: _____