

BINASAT COMMUNICATIONS BERHAD

WHISTLEBLOWING POLICY & PROCEDURES

SECTION 1: POLICY

This policy addresses the commitment of Binasat Communications Berhad ("BinaSat" or the "Company") and its group of companies ("BinaSat Group" or the "Group") to integrity and ethical behaviour by helping to foster and maintain an environment where employees can act appropriately, without fear of retaliation. To main these standards, BinaSat encourages its employees who have concerns about suspected serious misconduct or any breach or suspected breach of law or regulation (hereinafter referred to as "Concerns") that may adversely impact the Company, to come forward and express these Concerns without fear of punishment or unfair treatment.

BinaSat conducts business based on the principles of fairness, honesty, openness, decency, integrity and respect. It is BinaSat's policy to support and encourage its employees to report and disclose improper or illegal activities, and to fully investigate such reports and disclosures. It is also BinaSat's policy to address any complaints that allege acts or attempted acts of interference, reprisal, retaliation, threats coercion or intimidation against employees who report, disclose or investigate improper or illegal activities (the "Whistleblowers") and to protect those who come forward to report such activities. BinaSat assures that all reports will be treated strictly confidentially and promptly investigated and that reports can be made anonymously, if desired.

BinaSat's internal control and operating procedures are intended to detect and to prevent or deter improper activities. However, even the best systems of controls cannot provide absolute safeguard against irregularities. BinaSat has the responsibility to investigate and report to appropriate parties, allegations of suspected improper activities and to take appropriate actions. Employees and others are encouraged to use guidance provided by this policy for reporting all allegations of suspected misconduct or improper activities.

SECTION 2: BACKGROUND

Companies all over the world recognise that employees, from time to time, have concerns about what is happening at work, but are afraid to report those concerns.

Reports are not limited to fraud, theft or corruption, but about possible misconduct, cover a much wider range of bad practices, including behaviour that is not in line with the Company's values. Such bad practice can be happening, likely to happen or even have happened. These procedures are designed to encourage employees to voice concerns internally and promptly so as to prevent or remedy acts of misconduct.

Section 2.1 Compliance

This policy complies with Section 301.4 of Sarbanes-Oxley Act of 2002 concerning procedures for making complaints about accounting and auditing directly to the Audit Committee of the Company's Board of Directors. However, the procedures laid out in this document are not limited to complaints about accounting and auditing. It also extends to all the operational activities of the Company.

SECTION 3: OBJECTIVES AND SCOPE

Section 3.1 Objectives of this Policy

The intended objectives of this policy are:

- To provide avenues for employees to raise concerns and define a way to handle these concerns.
- To enable Management to be informed at an early stage about acts of misconduct.
- To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure.
- To help develop a culture of openness, accountability and integrity.

Section 3.2 Scope of this Policy

This Policy governs the reporting and investigation of improper or illegal activities at BinaSat, as well as the protection offered to the “Whistleblowers”. This Policy DOES NOT apply to or change the Company’s policies and procedures for individual employee grievances or complaints relating to job performance, terms and conditions of employment, which will continue to be administered and reviewed by BinaSat’s Human Resource Department.

SECTION 4: DEFINITIONS

a. Whistleblower:

A person or entity making a protected disclosure about improper or illegal activities is commonly referred to as a whistleblower. Whistleblower may be BinaSat employees, applicants for employment, vendors, contractors, customers or general public. The whistleblower’s role is as a reporting party. They are not, investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.

b. Good Faith:

Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

c. Misconduct/ Improper Activities:

Examples of misconduct include, but not limited to, fraud, including financial fraud and accounting fraud, violation of laws and regulations, violation of Company’s/ Group’s policies, unethical behaviour or practices, endangerment to public health or safety and negligence of duty.

SECTION 5: PROCEDURES

Section 5.1 General Guidance

This policy presumes that employees will act in good faith and will not make false accusations when reporting of misconduct by the Company’s employees. An employee who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary procedures, which may include termination. Employees who report acts of misconduct pursuant to this policy can and will continue to be held to the Company’s general job performance standards and adherence to the Company’s/ Group’s policies and procedures.

Section 5.2 Process for disclosure

I) Impropriety

This policy covers:

- a) improprieties or irregularities (including financial and operational);
- b) suspected fraud or criminal offences (including corruption, bribery or fraud);
- c) breach of confidentiality, miscarriage of justice;
- d) intentional misrepresentations, misstatements, omissions, directly or indirectly affecting financial statements or operation of the Group
- e) endangerment of an individual's health and safety; and
- f) failure to comply with legal or regulatory requirements

II) Reporting procedures

If any employee believes reasonably and in good faith that suspected incident of improper conduct or malpractice exists within the Group, the employee should report this immediately to the Chairman of the Audit and Risk Management Committee of the Company in writing, providing as much details as possible and specifying:

- a) the Whistleblower's full name, NRIC number and contact details;
- b) the background, date and history of the Concerns;
- c) suspected personnel(s) involved;
- d) the reasons for the Concerns;
- e) details of witnesses and all factual corroborating evidence as is available
- f) whether the Whistleblower has any personal interest in the matter
- g) whether action has already been taken by anyone

Any improper activities disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

Chairman of Audit and Risk Management Committee
Binaset Communications Berhad
Lot PT13824, Jalan Teknologi 4
Technology Park Malaysia
Bukit Jalil
57000 Kuala Lumpur
Email: larrystf@gmail.com

Any employment related Concerns can be reported to:

Managing Director
Binaset Communications Berhad
Lot PT13824, Jalan Teknologi 4
Technology Park Malaysia
Bukit Jalil
57000 Kuala Lumpur
Email: lam@binagroup.com.my

Disclosures shall be in writing and forwarded in a sealed envelope to the abovementioned contact person(s) labelling with a legend such as *"To be opened by the Chairman of Audit and Risk Management Committee or Managing Director only"*

III) Handling of a reported allegation

The action taken by the Group in response to a report of Concerns under this policy will depend on the nature of the Concerns. The Chairman of Audit and Risk Management Committee or Managing Director shall receive information on each report of Concerns and follow-up information on actions taken.

Section 5.3 Investigator

The Internal Auditor or Head of Human Resource, as the case maybe, shall be the named Investigator unless the Chairman of Audit and Risk Management Committee or Managing Director assign/appoint another Investigator. Investigators must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of the Audit and Risk Management Committee or Managing Director.

Section 5.4 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some Concerns may be resolved without the need for investigation.

If an investigation leads to the Investigator to conclude that a crime has properly been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group's Code of Ethics or Conduct, the results of the investigation shall be reported to the Chairman of Audit and Risk Management Committee or Managing Director, as the case maybe, in accordance with the applicable procedures for company conduct and the administration of discipline.

Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

SECTION 6: POLICY MATTERS

This policy shall be published at the Binasat's website and shall be displayed prominently at all the Group premises.

SECTION 7: MONITORING AND PERIODIC REVIEW OF POLICY

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group and, if necessary, implement changes subject to the approval of the Board of Directors.

The policy will be reviewed periodically to assess its effectiveness.

This Whistleblowing Policy & Procedures was first adopted by the Board on 14 June 2017 and was reviewed and approved by the Board on 20 October 2020.