

DATASONIC GROUP BERHAD
[200801008472 (809759-X)]

Whistleblowing (WB) Policy

Doc. No:	:	DGB-PLCY-WB
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Status of Document Change Control

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Prepared by IGC

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1.0 PURPOSE

- 1.1 The purpose of this Whistleblowing (WB) Policy is to provide a formal, confidential channel for all Datasonic Group Berhad (DGB) and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries are aware of our WB Policy which provide avenues for them to disclose or report in good faith any illegal, unethical, questionable practices or improper conduct committed or about to be committed within DGB and its subsidiaries without fear of being subject to detrimental conduct.
- 1.2 This WB Policy also act as an early warning system and to enable DGB and its subsidiaries to remedy any wrongdoings before serious consequences is caused.

2.0 SCOPE

- 2.1 The scope of this Whistleblowing (WB) Policy applies to all DGB and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries and extends to all internal and external stakeholders in all jurisdictions within which DGB and its subsidiaries operate.
- 2.2 This WB Policy is designed to provide them with proper internal and external reporting channels through the principles of trust, impartially and protection, and appropriate feedback via the following steps:-
- (a) receiving reports of wrongdoing;
 - (b) assessing reports of wrongdoing (triage);
 - (c) addressing reports of wrongdoing;
 - (d) concluding whistleblowing cases.
- 2.3 Personal grievances shall not be pursued by this WB Policy but through line managers or other appropriate channels where there is already appropriate existing internal policies or procedures such as Grievance Procedure or for allegations which normally be referred for consideration under the relevant policies and procedures, unless the whistleblower has good reason to believe that the appropriate process is not being followed effectively, in which case the provisions of this WB Policy shall apply in relation to that allegation.

3.0 TERMS AND DEFINITIONS

- 3.1 **"Case"**: An Incident that has passed substantiation requirements and is subject of an investigation.
- 3.2 **"Case Owner"**: A senior DGB and its subsidiaries' personnel assigned with the overall accountability for investigation outcomes as determined by this WB Policy, and for the appointment of suitable investigators, as well as overseeing investigation procedures and their closure. The Case Owner has also the authority to make recommendations on employee sanctioning.

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- 3.3 **“Detrimental Conduct”**: Any threatened, proposed or actual, direct or indirect, act or omission that can result in harm to a person, whistleblower or other relevant party, related to the reporting of a concern or wrongdoing.

Harm includes any adverse consequence, whether work-related or personal, including dismissal, suspension, demotion, transfer, change in duties, alteration of working conditions, adverse performance ratings, reduced opportunity for advancement, denial of services, blacklisting, boycotting, damage to reputation, financial loss, prosecution or legal action, harassment, isolation, or any form of physical or psychological harm.

Detrimental conduct includes retaliation, reprisal, retribution, deliberate action or omissions, done knowingly or recklessly to cause harm to a person, whistleblower or other relevant parties.

Detrimental conduct also includes the failure to prevent or to minimise harm by fulfilling a reasonable standard of care at any step of the whistleblowing process.

- 3.4 **“Incident”**: An actual, suspected or perceived unlawful act, breach of contract, immoral, improper or unethical behaviour, unfair treatment, discrimination or harassment, and includes violation of relevant DGB and its subsidiaries policies that advocate reporting of non-compliance, as well as a threat, demand or the like raised in relation to an unlawful act allegedly committed by DGB and its subsidiaries’ personnel.

- 3.5 **“Investigation”**: A systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine if wrongdoing has occurred and its extent.

An investigation can be an internal investigation or an external investigation, and it can be a combined investigation. An internal investigation is conducted by DGB itself, or by an external party on DGB’s behalf. An investigation can also be imposed on DGB by external parties.

- 3.6 **“Personnel”**: All individuals working at all levels and grades, including directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, trainees, interns, protégé pupil, sponsors, or any other person associated with DGB and its subsidiaries.

- 3.7 **“Retaliation”**: Action by way of unfair, unlawful or otherwise inappropriate reprisal taken in return of an actual or perceived injury or offence.

- 3.8 **“Third Parties’ Intermediaries”**: Any external individual or organisation that DGB has, or plans to establish, some form of business relationship. This may include actual and potential clients, customers, contractors, suppliers, distributors, business contacts, agents, advisers, joint ventures, joint venture partners, intermediaries, sales representatives or consultants and government and agencies and public bodies – this includes (but is not limited to) their advisors, representatives, public officials, politically exposed persons and political parties.

- 3.9 **“Triage”**: Assessment of the initial report of wrongdoing for the purposes of categorization, taking preliminary measures, prioritization and allocation.

- 3.10 **“Whistleblower”**: A person who reports wrongdoing.

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- 3.11 **“Whistleblowing”**: Reporting of wrongdoing by a whistleblower who has reasonable grounds to believe that the information reported such as any illegal, unethical, questionable practices or improper conduct committed or about to be committed is true at the time of disclosing or reporting in good faith.

Open whistleblowing - whistleblower discloses information without withholding their identity or requiring that their identity be kept secret.

Confidential whistleblowing - the identity and any information that can identify the whistleblower is known by the recipient but is not disclosed without the whistleblower's consent, unless required by legal and/or investigation process.

Anonymous whistleblowing - information is received without the whistleblower disclosing his / her identity.

- 3.12 **“Wrongdoing”**: action(s) or omission(s) that shall cause harm.

Wrongdoing shall include but is not limited to the following: unethical behaviour, fraud, corruption including bribery, breach of law (national or international), breach of the organization's or other relevant code of conduct, gross negligence, breach of organization policy, discrimination, bullying, harassment, unauthorized use of public funds or resources, abuse of authority, conflict of interest, gross waste or mismanagement.

Wrongdoing also includes action or omission resulting in damage or risk of harm to: human rights, the environment, public health and safety, safe work-practices or the public interest.

A wrongdoing or the harm can have happened in the past or is currently happening or could happen in the future.

A potential harm can be determined by reference to a single event or series of events.

4.0 APPLICABLE FORMS

- 4.1 Whistleblowing Reporting Form

5.0 RESPONSIBILITIES

- 5.1 Datasonics Group Berhad (DGB)'s Governing Body and Top-level Management are responsible for developing and establishing this Whistleblowing (WB) Policy within DGB and its subsidiaries and supported by an appropriate corporate culture of integrity led by the Board of Directors, Executive Leadership and Senior Management, which prohibits any illegality, improper conduct and/ or wrongdoings within DGB and its subsidiaries.

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- 5.2 The Risk Management Committee (RMC) of DGB has the overall responsibility for the implementation of this WB Policy to ensure that DGB and its subsidiaries are also committed to protect the whistleblower from all acts of harassment, retaliation, victimization, discrimination and risk of reprisal or detrimental treatment arising from making the disclosure in good faith and any report of wrongdoings are to be objectively investigated, responded and addressed.
- 5.3 The RMC has delegated day-to-day responsibility for the administration and implementation of this WB Policy to the Chief of Risk & Compliance Officer. The use and effectiveness of this WB Policy shall be regularly monitored and reviewed by the Integrity and Governance Committee.
- 5.4 The custodian of this WB Policy is the Chief of Risk & Compliance Officer who shall be responsible for incorporating any amendments and updates into this document, obtaining approval from the Risk Management Committee and Board for the amendments and updates, as well as distributing the same to the relevant parties.
- 5.5 It is the responsibility of the management of each subsidiaries / division / department to ensure that all DGB and its subsidiaries' personnel, business associates and third parties' intermediaries who perform, or shall perform, services and act on behalf of DGB and its subsidiaries are aware of this WB Policy so as them to disclose or report in good faith any illegal, unethical, questionable practices or improper conduct committed or about to be committed within DGB and its subsidiaries without fear of being subject to detrimental conduct.

6.0 PROCEDURES

6.1 Whistle Blowing (WB) Policy Statement

Datasonic Group Berhad is committed to maintain and preserve the highest standard of governance, integrity, accountability and transparency in all our business activities as a recognized and reputable investment holding and to provide creative and innovative Information and Communication Technology (ICT) business solutions through proper implementation of ISO 37001:2016 Anti-bribery Management System (ABMS) and Ministerial Guidelines on Adequate Procedures (GAPs) to prevent, detect, and respond to bribery and corruption.

Datasonic Group Berhad shall uphold all statutory laws and regulations relating to anti-bribery and anti-corruption and maintain a culture of integrity for all employees and stakeholders with the encouragement to raise any concerns in good faith through our Whistleblowing Policy without fear of reprisal.

To achieve this objective, Datasonic Group Berhad shall:

Driving our commitment to protect and support whistleblower who report wrongdoing in good faith;
Guiding our personnel to speak up without fear of retaliation and unfair actions or detrimental conduct; and
Bonding our multi-stakeholders to ensure confidentiality and data protection right of whistleblower.

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6.2 Implementation Guidelines

- (a) This Whistleblowing (WB) Policy makes it clear that any incidents or concerns can be raised without fear of retaliation or detrimental conduct. This WB Policy provides a formal channel to encourage and enable DGB and its subsidiaries' personnel and various stakeholders to raise
- (b) serious concerns rather than ignoring a problem or making anonymous allegations.
- (c) Whistleblowing reports shall be factual, not speculative and made in good faith with reasonable belief that the information and allegations are true without any frivolous / malicious intentions for personal gain / interests. Otherwise appropriate disciplinary or legal actions shall be initiated against the whistleblower(s) for false allegation.
- (d) A whistleblower shall be accorded confidentiality of identity including to the extent, reasonably practicable. However, the RMC Committee has the ultimate discretion to reveal the whistleblower's identity with prior consent to the parties involved in the investigation and other proceedings on a confidential and 'need to know' basis.
- (e) In the event if a whistleblower is implicated or noted to be or have been involved in any wrong doing, he / she shall be also investigated to obtain necessary evidence and mitigating circumstances for validating the allegation. An investigation shall not be treated as a reprisal against the whistleblower but to facilitate decision making.
- (f) A whistleblower's role is a reporting party and not an investigator nor a fact finder. He or she cannot determine or recommend the appropriate corrective or remedial actions to be taken.
- (g) Wrongdoings, improper conducts, unethical practices or malpractices include, but are not necessarily limited to :-
 - (i) Bribery and corruption including money laundering, insider trading;
 - (ii) Fraud (misappropriation, embezzlement or theft) of DGB and its subsidiaries' funds or assets, improprieties and irregularities in accounting and financial reporting, or blackmail;
 - (iii) Conflict of interest, abuse of authority and discrimination, gross negligence and mismanagement;
 - (iv) Disregard or serious non compliances with DGB and its subsidiaries' policies and procedures, financial, legal or regulatory obligations;
 - (v) Breach of law (national or international), breach of DGB and its subsidiaries' or other relevant code of conduct and policies;
 - (vi) Unauthorised disclosure or use of DGB and its subsidiaries' confidential information including commercial or manufacturing secrets, calculations or designs
Any unlawful act, whether criminal or civil in nature;
 - (vii) Conduct, act or omission which is likely to create a substantial or specific danger to the health and safety of employees or other individuals or give rise to risk of damage to assets/properties;
 - (viii) All forms of harassment including but not confined to unwelcome verbal or physical advances and sexually or otherwise derogatory or discriminatory statement or remark;
 - (ix) Acts, omissions or concealments of wrongdoing knowingly, wilfully and intentionally which are detrimental to DGB and its subsidiaries' interests or reputation;

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(x) Collaborating with a person(s) to commit any of the above wrongdoings.

- (h) Personal grievances shall not be pursued by whistleblowing but through line managers or other appropriate channels.

6.3 Compliance to the Law

- (a) Datasonic Group Berhad (DGB) and its subsidiaries shall comply with all applicable laws, rules and regulations of the governments, commissions and exchanges in jurisdictions within which DGB and its subsidiaries operates.
- (b) DGB and its subsidiaries' reserve its right to report any actions or activities suspected of being criminal in nature to the government agencies, anti-corruption agency, police or other relevant authorities.

6.4 Supplementary to Whistleblowing (WB) Policy

- (a) This WB Policy has taken into consideration of the Section 587 of the Companies Act 2016 which were intended to further enhance Corporate Governance in Malaysia, and the Whistleblower Protection Act 2010 wherein provisions have been made to protect whistleblower make disclosures on breach or non-observance of any requirement or provision of the applicable law and regulations or on any serious offence involving wrongdoings, improper conducts, unethical practices or fraud and dishonesty.
- (b) This WB Policy shall be read in conjunction with Datasonic Group Berhad (DGB) and its subsidiaries' various policies and procedures such as :-
- (i) Code of Conduct and Ethic for Directors;
 - (ii) Corporate Disclosure Policy and Procedures;
 - (iii) Employee Business Conduct Guidelines;
 - (iv) Employee Handbook;
 - (v) Discretionary Authority Limits ("DAL"); and
 - (vi) Anti-bribery Anti-corruption Policy.

6.5 Receiving Report of Wrongdoing or Concern

- (a) All Datasonic Group Berhad and its employees and stakeholders are encouraged to raise genuine concern about any wrongdoing or improper conduct at the earliest opportunity, and in an appropriate way.
- (b) Any reporting of wrongdoing or raising a concern shall be factual, not speculative or grievance, and made in good faith with reasonable belief that the information and incidents are true without any frivolous or malicious intentions for personal gain and interests.

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- (c) Any disclosure made shall contain the following information:
- (i) Personal details of the Whistleblower (Name, Identification, Email address, Contact details,
 - (ii) Preferred Mode of communication, etc)
 - (iii) Date, Time, location of Incident
 - (iv) Information of alleged person(s) involved
 - (v) Details of Alleged Incident
 - (vi) Other relevant information and any available documentation or supporting evidence
 - (vii) Declaration
- (d) Whistleblowers are required to sign a declaration stating that information provided is true, correct and complete as well as allow the information provided to be used and processed for investigations, including where necessary, the forwarding of the information to the authorities.
- (e) As far as reasonably practicable, incidents reporting and disclosures shall be made privately and in confidence to the RMC Chairman. The reporting mode of wrongdoing shall be the following means:-
- (i) Open whistleblowing which the whistleblower discloses information without withholding their identity or requiring that their identity be kept secret;
 - (ii) Confidential whistleblowing where the identity and any information that can identify the whistleblower is known by the recipient but is not disclosed without the whistleblower's consent, unless required by legal and/or investigation process;
 - (iii) Anonymous whistleblowing where the information is received without the whistleblower disclosing his / her identity.
- (f) The Whistleblower can choose to remain anonymous as Datasonic Group Berhad (DGB) and its subsidiaries shall put in safeguards to protect the identity of the Whistleblower. The Whistleblower shall also be made identifiable as whistleblower protection cannot be given to an anonymous source.
- (g) A disclosure of wrongdoing or improper conduct shall be made in writing (via e-mail, fax or letter) or orally or Short Messaging Services ("SMS") or WhatsApp Chat (via phone). The disclosure made shall contain a brief summary of the alleged incident, name of alleged individuals involved or witnesses to the incident and other relevant information as mentioned in item 6.6(c).
- (h) Such detailed information shall be forward
- (i) In writing, to the attention of:

Datasonic Group Berhad
Level 6, Bangunan Setia 1
No.15, Lorong Dungun
Damansara Heights
50490 Kuala Lumpur
Attention: Risk Management Committee Chairman

Mark on the envelope, "Strictly Confidential. To be opened by Addressee only"

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- (ii) Via Email, to the attention of:

Email Address: speakup@datasonic.com.my

- (iii) Via Phone, to the attention of:

Contact Number: +6012 212 6470

- (iv) Via Short Messaging Services ("SMS")

Contact Number: +6012 212 6470

- (v) Via WhatsApp Chat

Contact Number: +6012 212 6470

- (vi) Secured Website Form

Web Address: <https://datasonic.com.my/welcome/investors.php>

6.6 Assessing reports of wrongdoing

- (a) All reports of wrongdoings, disclosures and concerns shall be received in confidence by the Risk Management Committee (RMC) Chairman, who will then notify the RMC and the Board of the report and the recommended action to be undertaken. The reporting mode of wrongdoing shall be (i) Open whistleblowing; (ii) Confidential whistleblowing; or (iii) Anonymous whistleblowing.
- (b) If the incident(s) do not involve the Board of Directors, Executive Committee or Senior Management, then the Chief of Risk & Compliance shall conduct the triage assessment of the initial report of wrongdoing for the purposes of categorization, taking preliminary measures, prioritization and allocation.
- (c) If the incident(s) do involve the Board of Directors, Executive Committee or Senior Management, the RMC Chairman shall inform the DGB Chairman immediately.
- (d) The RMC Chairman (in consultation with the committee members) shall review all reports received directly from whistleblower(s) and selects another person or group function to replace the Chief of Risk & Compliance Officer to conduct a preliminary assessment and investigation before a decision is made. The newly appointed person or group function shall carry out the preliminary assessment of the wrongdoing reports from item 6.6 (e) to (h) in the case of replacing the Chief of Risk & Compliance Officer.
- (e) Likewise, the Chief of Risk & Compliance Officer shall, as soon as it is feasible upon receiving a concern, conduct a preliminary triage assessment based on the available information or document received.

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- (f) When assessing the reports, the Chief of Risk & Compliance Officer shall consider the followings:-
- (i) Is the wrongdoing within the scope of the WB Policy? If not, it shall be dealt with in accordance with another procedure or addressed in another way such as under grievances.
 - (ii) How did the whistleblower obtain the information? Is the information first-hand or hearsay?
 - (iii) Is the wrongdoing a criminal offence? Does the wrongdoing need to be referred to law enforcement or regulatory authorities?
 - (iv) WHO - Who may be involved?
Who is likely to have relevant knowledge or information?
Is the management involved?
 - (v) WHAT - What is the specific allegation?
What evidence may exist?
 - (vi) WHERE - Where did the allegations take place?
Is there reason to suspect that other locations are involved?
 - (vii) WHEN - When did the events occur?
Is the activity ongoing?
 - (viii) HOW - How were the activities conducted?
How was the activity concealed?
 - (ix) WHY - Why did the activity take place?
Was there an advantage personal gained?
- (g) The outcome of assessing the report of wrongdoing shall include doing one or more of the following:
- (i) Engage with other functions (e.g. Human Capital, Legal, Internal Audit, Finance), if needed, and if this does not compromise the trust, impartiality and protection of the investigation, to support the investigation;
 - (ii) Carry out further fact finding (e.g. gather further information);
 - (iii) Take preliminary measures (e.g. suspension of the subject of the report, secure evidence, etc.);
 - (iv) Investigate the report of wrongdoing;
 - (v) Refer to other procedure such as Grievances;
 - (vi) Inform relevant authorities (e.g. law enforcement or regulatory body);
 - (vii) Conclude the case.
- (h) An initial report, amongst other things, including relevant and appropriate recommendation shall be submitted to RMC Chairman for its deliberation and further action.

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- (i) If the outcome of the initial report substantiates that the alleged wrongdoing or concern raised is serious and has significant adverse impact on DGB and its subsidiaries (including but not limited to serious fraudulent or unlawful activities, criminal breach of trust and corruption) as described under item 6.2 (f), the RMC Chairman shall appoint a specific person(s) as “Investigator(s)” who shall be responsible for carrying out the task.

6.7 Addressing reports of wrongdoing / Conduct of Investigation

- (a) As a general principle, all Incidents shall be investigated if sufficiently substantiated as in the triage assessment of wrongdoing reports. Substantiation in this context refers to identifying and assessing facts to determine whether the Incident report had enough merits or credibility and was submitted by a credible source. All investigations shall be assigned to an Investigator.
- (b) 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, as well as the status of follow-up actions taken by the relevant departments.
- (b) If required, the Investigator shall obtain assistance from other resources within DGB and its subsidiaries (e.g. Internal Audit Department, Human Capital Department, Legal Department, Integrity and Governance Committee, etc.).
- (c) If necessary, the Investigator shall request the Internal Auditor or the External Auditor to conduct further investigations as appropriate and engage, consult and obtain external legal or other independent professional advice on a case to case basis.
- (d) Necessary preventive measures shall be implemented to prevent the conduct from continuing or re-occurring in future. Disciplinary actions will also be taken against the culpable person(s).
- (e) Whenever possible, interviews shall be conducted with the whistleblower and all relevant witnesses, and every attempt shall be made to gather all information and materials from all available sources.
- (f) All interviews and activities associated with the investigation shall be documented in writing and filed for the purpose of record to support the findings, recommendations and/or actions taken.
- (g) The investigator shall maintain a record of the wrongdoing report and outcome of the investigation. An original of documents and records of each report/disclosure shall be marked “CONFIDENTIAL” and to be forwarded to Human Capital Department to be stored and archived into employee personal file.

6.8 Protection of Whistleblower

- (a) DGB and its subsidiaries are committed to ensure that all disclosed information, including the identity of the whistleblower shall be treated with strict confidentiality. All personnel, directly or indirectly working relative to a whistleblowing case, shall strictly protect the identity of the whistleblower and witnesses from unauthorized disclosure before, during and after an investigation.

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- (b) Datasonic Group Berhad (DGB) and its subsidiaries expect all internal and external Whistleblower(s) to act in good faith and have reasonable grounds when reporting an Incident. If an allegation is proven to be ill-intentioned, malicious and frivolous, the whistleblower(s) shall face disciplinary action including termination of employment.
- (c) A whistleblower who reports an Incident in good faith shall not be subject to unfair dismissal, victimization, demotion, suspension, intimidation, or harassment, discrimination, any action causing injury, loss or damage or any other retaliatory actions, even if it is not subsequently confirmed by an investigation and shall be eligible for protection under this WB Policy.
- (d) A whistleblower who reports on an Incident in good faith and who has been subject to retaliatory actions, or detrimental treatment shall lodge a complaint pursuant to this WB Policy. The same procedures for investigating Incidents shall apply to any complaints of retaliatory action.
- (e) Any of DGB and its subsidiaries' personnel that intimidates, harasses, victimizes or retaliates against a whistleblower who reported an ethics concern in good faith shall be subjected to appropriate disciplinary action including termination of employment.
- (f) DGB and its subsidiaries shall take all reasonable steps to protect the identity of whistleblower and keep confidential both the information and concerns of the Incident reported as well as its subsequent discussion and actions taken.
- (g) Similarly, the whistleblower shall take all reasonable steps to maintain confidentiality, especially with regards to the fact that a report has been lodged, the nature of the Incident, and the identity of the person(s) who have allegedly committed the Incident.
- (h) Any of DGB and its subsidiaries' personnel who is assisting in the investigation shall also be accorded protection to the same extent as the whistleblower.
- (i) This WB Policy provides assurance that the whistleblower that no action shall be taken against the whistleblower in accordance with Section 587 of the Companies Act 2016 and whistleblower Protection Act 2010.
- (j) DGB and its subsidiaries reserves the right to take disciplinary action against those who:
 - (i) Wilfully disclose any matter knowing the matter to be false; or
 - (ii) Make reports with the intention to deceive or misinform;
 - (iii) wilfully disclose any confidential information to the public.

6.9 Revocation of Protection

- (a) The protection of the whistleblower stated in the above paragraph 6.8 shall be revoked by DGB and its subsidiaries if:
 - (i) The whistleblower made his/her report/disclosure without good faith;
 - (ii) The whistleblower willingly or maliciously made his/her report/disclosure, knowing and believing the information is false or untrue; or
 - (iii) The report/disclosure was made for personal gain or interest or with intention or motive to avoid dismissal or other disciplinary action.

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- (b) DGB and its subsidiaries view seriously any false, malicious or defamatory allegation. This can be considered as gross misconduct where appropriate disciplinary shall be taken including termination of employment.

6.10 Confidentiality

- (a) DGB and its subsidiaries shall treat all reports or disclosures as sensitive and shall only reveal information on a “need to know” basis or if required by law, court or authority.
- (b) DGB and its subsidiaries shall make every effort to treat report or disclosures in a confidential and sensitive manner.
- (c) The identity and particular of the whistleblower shall also be kept private and confidential unless the whistleblower chose to reveal his/her identity.
- (d) Where the whistleblower has chosen to reveal his/her identity when making such report, written permission from the whistleblower would be obtained before the information is released.

6.11 Concluding whistleblowing cases.

- (a) Wherever possible, any investigation shall be completed in a timely manner, within a period of thirty (30) days from the date of receipt of disclosure. However, there are circumstances where cases can take a longer period of time to resolve, but speedy resolutions shall take priority.
- (b) Investigations shall be considered completed when sufficient evidence was obtained to substantiate an allegation or to conclude it was unsubstantiated. The Investigation Report shall be submitted to RMC.
- (c) Upon completion of the investigation, the Investigation Team shall table a report on outcome of the investigation with recommended course of actions at the RMC Meeting for their deliberation.
- (d) Moreover, investigations shall be inconclusive due to the lack of evidence. Authority to conclude an investigation rests with the Case Owner, with veto rights assigned to the RMC Chairman.
- (e) The RMC Chairman shall then report to the Board of Directors ('Board') on matters reported which require the Board's approval.
- (f) The Chief of Risk & Compliance Officer shall carry out the decisions of the Board of Directors of DGB in relation to findings arising from an investigation.
- (g) Where applicable, the Chief of Risk & Compliance Officer shall institute appropriate measures to prevent further Incidents. Any disciplinary action against the violator(s) shall be carried out in accordance with DGB disciplinary policies and local legislation.
- (h) Subject to DGB policies and local legislations, the Case Owner, shall inform the whistleblower that the investigation is completed, and the findings have been presented to the Risk Management Committee or the Board of the Company. As findings are confidential, details of the findings shall not be disclosed to the whistleblower.

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6.12 Decision on Report

- (a) If an investigation concludes that an improper conduct has been committed, the matter shall be handled in accordance with the company's existing disciplinary procedures and applicable laws and regulations of the domicile company or subsidiary. Improper conduct refers to illegal act, malpractice, unethical conduct or other forms of wrongful conduct, which if proven, constitutes a disciplinary or criminal offence.

6.13 Referral to External Enforcement Authority

- (a) DGB and its subsidiaries shall refer the investigation to the appropriate enforcement body for independent investigation or initiation of civil action.

6.14 Immunity / Disclaimer

- (a) If any of DGB and its subsidiaries' personnel who participate in any act that constitute the act of violation of laws, policies and procedures mentioned above which he/she reported shall not be given immunity against any investigation or disciplinary/criminal proceeding arising out of the report made. Nevertheless, in such circumstances, the fact that he/she had caused the report to be made may be taken into consideration as a mitigating factor.

6.15 Review of WB Policy

- (a) The Board of Directors, Executive Committee, Executive Leadership, Senior Management of Datasonic Group Berhad shall monitor the implementation of this WB Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate for its suitability, effectiveness and efficiency.
- (b) The Risk Management Committee shall review and update (when necessary) this Policy with the Management annually before forwarding to the Board of Directors for approval. This Policy is subject to updating /modifications from time to time to be in line with applicable laws and regulations and organizational changes within the Group. All employees and stakeholders shall be informed by email or in writing.

7.0 RECORD

- 7.1 Applicable records specified in sub-paragraph 4 (Whistleblowing Incident Reporting Form) of this procedure shall be kept and retained as defined in our Standard Operating Procedure **Control of Records**.
- 7.2 All the disclosures made by the whistleblowers, documents received during investigation and reports of the investigation should be retained by Datasonic Group for a minimum period of seven years.

DATASONIC GROUP BERHAD
[200801008472 (809759-X)]

Whistleblowing (WB) Policy

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Appendix I: WHISTLEBLOWING INCIDENT REPORT Form

	MODE OF WHISTLEBLOWER : [] OPEN; [] CONFIDENTIAL; [] ANONYMOUS	
A	PERSONAL DETAILS OF WHISTLEBLOWER	
1.	NAME :	
2.	ID No:	POSITION :
3.	Email :	CONTACT No:
B	DETAILS OF THE INCIDENT	
1.	INCIDENT DATE & TIME :	
2.	INCIDENT LOCATION :	
C	INFORMATION OF ALLEGED PERSON(S) INVOLVED	
1.	NAME :	
	POSITION :	
2.	NAME :	
	POSITION :	
3.	NAME :	
	POSITION :	
D.	DETAILS OF ALLEGED INCIDENT (Attach additional sheets, if necessary)	
E	ADDITIONAL SUPPORTING EVIDENCES (Attach additional sheets, if necessary)	
F	DECLARATION	
	I hereby declare that all the information given herein are made voluntary and are true, correct and complete to the best of my knowledge and that all disclosed information, including the identity of the whistleblower shall be treated with strict confidentiality without fear of being subject to detrimental conduct. I do understand that DGB and its subsidiaries shall use the information and material provided throughout the investigation processes.	
	Signature : _____	
	Name : _____	
	Date : _____	