



ANEKA JARINGAN HOLDINGS BERHAD
(Registration No. 201801030681 (1292707-D))

WHISTLEBLOWING POLICY AND PROCEDURES

This Whistleblowing Policy is for the internal use of Aneka Jaringan Holdings group of companies. The Company shall review and update this policy from time to time.

CONTENTS

Section

1. Introduction
2. Objectives
3. Scope
4. Misconducts
5. Reporting a Violation
6. Protection
7. Administration

1. INTRODUCTION

Aneka Jaringan Holdings Berhad (“AJHB” or “Company”) is committed to promoting and maintaining the highest standards of integrity, accountability, and transparency at its workplace as well in the conduct of its businesses and operations.

The purpose of this Whistleblowing Policy is to facilitate the earliest possible disclosure by the employees or third parties in a responsible and appropriate manner about possible improprieties without fear of reprisals or detrimental actions against the individuals concerned.

2. OBJECTIVES

The objectives of this policy are as follows:

- i. To provide clear and transparent procedures for individuals to report any cases of suspected and/or known misconduct, wrongdoing, corruption, fraud, abuse or breach of legal obligation. Such breach of legal obligation includes negligence, breach of contract, danger to health and environment and/or cover up of such happenings in the workplace.
- ii. To manage such disclosures in a timely and appropriate manner.
- iii. To ensure that the parties reporting such incidents of wrongdoings are protected from reprisal and that their identities are safeguarded.

3. SCOPE

This policy shall apply to all employees under AJHB group of companies and all third parties who are aware of/suspect that an employee is engaged in misconducts.

4. MISCONDUCTS

Misconducts includes the following:

- i. Criminal offence under the law, such as fraud, corruption, forgery, cheating, criminal breach of trust, insider dealing, abetting, or intention to commit criminal offence.
- ii. Misuse of Company’s resources or assets and/or confidential information.
- iii. Intentional destruction of Company’s property.
- iv. Failure to comply with legal or regulatory obligations.
- v. Damage to the environment.

- vi. An act or omission which creates a substantial and specific danger to lives, health or safety risk to the public as well other employees.
- vii. Any other conduct which is not considered ethical in the proper sense.

This list is complementary to AJHB's policies and procedures which deal with the expected standard of staff's conduct at work and is not considered exhaustive.

5. REPORTING A VIOLATION

If a Whistleblower suspects or knows of any violation that may occur or has occurred, the Whistleblower is encouraged to raise it to AJHB 's Chairman of Audit and Risk Management Committee.

This can be done in writing to the Chairman of Audit and Risk Management Committee, Aneka Jaringan Holdings Berhad, K-2-1, Pusat Perdagangan Bandar, Persiaran Jalil 2, 57000 Kuala Lumpur or by e-mail to armc@ajgroup.my.

The report shall include the following:

- i. Details of the person(s) involved;
- ii. Details of the allegations:
 - a. nature of the allegation;
 - b. where and when the alleged misconduct/wrongdoing took place;
- iii. Supporting evidence if available;
- iv. Name, designation, office contact/mobile of the individual making the report.

The Chairman of Audit and Risk Management Committee and the members of Audit and Risk Management Committee will review each report and based on the information received and evidence available, conduct preliminary investigation to establish whether the claim has merit and can be substantiated. Each merited claim will be investigated independently using appropriate channels, resources and expertise and based on the findings, determine the appropriate action to be taken.

6. PROTECTION

Under the Whistleblowing Policy of the group, the Whistleblower shall be accorded the necessary protection against any reprisals or retaliation including any form of harassment or victimisation from anyone within the group as a consequence of his/her reporting, provided the reporting is made in good faith.

The identity of the Whistleblower shall be kept with utmost confidentiality at all times in accordance with the Whistleblower Protection Act 2010.

However, the protection of the Whistleblower will be revoked under the following circumstances:

- i. The reporting Whistleblower participated in the activities contributing to the misconduct except for circumstances where he/she has to under duress or coercion.
- ii. The report is false in nature and done with malicious intent or is motivated by personal agenda or ill will.
- iii. The report is of a frivolous or vexatious nature.

7. ADMINISTRATION

The Whistleblower shall be informed of the result of the progress of any investigation and/or any action or decision taken by the Company in respect of report made in accordance with this policy.

A Senior Management, Head of Internal Control or his designate shall be responsible for the administration, revision, interpretation and application of the policy. The policy will be reviewed annually or as and when necessary and revised to ensure its effectiveness. Any revision or amendment shall be subjected to the review by the Audit and Risk Management Committee and/or Board of Directors.