

GDEX Whistleblowing Policy and Procedures

INTRODUCTION

GDEX Group is committed to upholding the highest standards of ethical conduct, integrity and accountability in all business activities and operations, in compliance with applicable anti-bribery and related laws, as well as the ISO 37001:2025 Anti-Bribery Management System (ABMS).

In line with this commitment, GDEX has established this Whistleblowing Policy and Procedures (WBPP) in accordance with the Whistleblower Protection Act 2010 and guided by the following principles:

- To promote a culture of openness, accountability and integrity
- To establish formal reporting channels
- To provide clear communication on the reporting process
- To preserve confidentiality and, where applicable, anonymity
- To protect whistleblowers who report in good faith from retaliation or unfair treatment
- To prevent misuse of the whistleblowing process
- To safeguard the position and confidentiality of persons who are the subject of a report
- To notify the whistleblower of the outcome of the findings, where appropriate

OBJECTIVES

- 1) To ensure that all GDEX employees and stakeholders understand the WBPP and are able to raise concerns regarding suspected malpractice or improper conduct without fear of retaliation or unfair treatment.
- 2) To provide appropriate internal reporting channels for the disclosure of improper or unlawful conduct in accordance with this WBPP.
- 3) To ensure that disclosures are addressed appropriately and in a timely manner.
- 4) To provide protection to whistleblowers against reprisal arising from a disclosure made in good faith and to safeguard the confidentiality of such whistleblowers.
- 5) To ensure fair treatment of both the whistleblower and the person who is the subject of the disclosure.

This WBPP provides guidance to GDEX employees and stakeholders on the process for raising such concerns.

DEFINITION

Whistleblowing refers to the disclosure by employees or stakeholders of information relating to malpractice, misconduct or other improper conduct occurring within GDEX.

A whistleblower is a person who makes a protected disclosure based on a reasonable belief that malpractice, misconduct or improper governance has occurred. A whistleblower is not an investigator and is not entitled to participate in any investigation other than as requested by the investigators.

WHAT TO REPORT

The following matters may be reported under this WBPP:

- Non-compliance with applicable laws and regulations
- Financial malpractice
- Misuse of GDEX funds or assets
- The theft, damage or misuse of data stored within GDEX computer systems, whether deliberate or accidental
- discrimination
- Danger to public or employee health and safety
- Suspected fraud or criminal activity
- Corruption, bribery or blackmail
- Breach of confidentiality
- Breach of the GDEX Code of Ethics and Conduct as set out in the GDEX Employee Handbook
- Non-compliance with GDEX policies and procedures
- sexual assault or sexual harassment
- Sexual assault or sexual harassment
- Any other similar or related irregularity

This WBPP should not be used for the following matters:

- Poor performance
- Lack of professionalism
- Personal disputes
- Personal grievances

Where it is unclear whether a particular matter falls within the scope of the malpractices described above, the whistleblower may seek guidance from the Whistle Blowing Governance Unit (WBGU).

The deliberate submission of a false report, whether oral or written, constitutes an improper act and may result in appropriate action being taken by GDEX.

IMPORTANCE OF WBPP TO GDEX

- Enable Management to be informed at an early stage of possible contraventions
- Support a culture of openness, accountability and integrity
- Promote good corporate governance and curb unethical or unlawful practices at all levels
- Minimise harm to GDEX and its stakeholders

ROLE OF EVERY GDEX EMPLOYEE / STAKEHOLDER

- To be aware of and understand the WBPP
- To understand the importance of whistleblowing
- To report malpractices described in this WBPP in good faith

REPORTING RULES & PROCEDURES

- Any GDEX employee or stakeholder who becomes aware of malpractice or wrongdoing should report the matter to the WBGU [Independent Director and Chief Regulatory Officer].
- A report may be made through the following channels:
 - a. by Email to WBGU (wbg@gdexpress.com)
 - b. by WhatsApp / SMS to handphone no: +60 16 339 0719
- A whistleblower may choose to remain anonymous. However, to be eligible for protection under this Policy, the whistleblower is required to disclose his or her name, NRIC number and contact details.
- The WBGU shall ensure that all information received is treated with the strictest confidence. The identity of the whistleblower shall be kept confidential at all times, subject to any disclosure required by law.
- A whistleblower who makes a report in good faith shall be afforded protection and shall not be punished or treated unfairly.
- Where an investigation determines that the reported concerns cannot be substantiated, no action shall be taken against a whistleblower who made the report in good faith.
- At the request of the whistleblower, the whistleblower shall not be required to testify against the reported person in any hearing, subject to applicable legal requirements.
- Any employee who misuses the WBPP by deliberately making a false report may be subject to review of his or her employment and other appropriate action.
- Pending completion of the investigation and confirmation of the concerns, the confidentiality of the person who is the subject of the report shall also be safeguarded.
- The WBGU will notify the whistleblower of the outcome of its findings within 30 days from receipt of the report, where appropriate.

CONFIDENTIALITY, IMMUNITY AND PROTECTION AGAINST DETRIMENTAL ACTION

(a) Confidentiality

Appropriate measures shall be implemented to safeguard the confidentiality of the whistleblower's identity and the information disclosed, subject to any disclosure required by law.

(b) Protection from Liability

Whistleblowers who make disclosures in good faith shall be protected from civil, criminal and disciplinary liability arising from such disclosures, subject to applicable law.

(c) Protection Against Detrimental Action

Adequate safeguards shall be established to protect whistleblowers from any form of retaliation or detrimental action, including dismissal, demotion, harassment or discrimination.

ASSURANCE

- Every reasonable effort shall be made to preserve the confidentiality of the whistleblower's identity. The identity of the subject of a report shall also be treated confidentially, to the extent permitted by law and consistent with the requirements of the investigation.
- GDEX gives assurance that it will not disclose the identity of the whistleblower to any third party who is not involved in the investigation or prosecution of the matter. The whistleblower's anonymity shall be preserved in relation to other employees and the public unless the whistleblower agrees otherwise. Where a concern cannot be resolved

without revealing the identity of the whistleblower, for example where evidence is required in court, the matter shall first be discussed with the whistleblower, where practicable, before further action is taken.

- The only exception to this assurance arises where there is an overriding legal obligation to disclose confidential information, including where disclosure is required by a court of law.
- The assurance of confidentiality can only be effectively maintained if the whistleblower also preserves confidentiality.
- The WBGU shall act impartially and independently in relation to all parties concerned, and shall discharge its duties with fairness, objectivity, thoroughness, ethical conduct, and due regard to legal and professional standards.

CONCLUSION

The Board of Directors of GDEX is firmly committed to fostering a strong whistleblowing culture and shall, through the WBGU, regularly assess the effectiveness of the Company's internal whistleblowing system.

GDEX employees and stakeholders are encouraged to provide suggestions and feedback to improve the Company's whistleblowing system.

POLICY REVIEW

This Policy will be reviewed annually and as and when required. The Policy is available on the Company's website (please refer to <https://tinyurl.com/yftr4hbv> in the Company's website www.gdexpress.com for the policy).

WBPP Flow Chart

