

	<b>WHISTLEBLOWING POLICY</b>	Doc. No. : CG-12
		Rev. No. : 2
		Effective Date : 17/10/2023
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## 1. INTRODUCTION

This Whistleblowing Policy (the “Policy”) is designed to facilitate and encourage disclosure of genuine and legitimate concerns about any possible violations and improprieties in matters related to financial reporting, compliances, and other malpractices to be raised by Board, all employees and officers of the Group. The policy provides an opportunity for those concerns to be investigated and for appropriate action to be taken to ensure that the matter is resolved effectively and within the Group wherever possible. All directors and employees of Zen Tech International Berhad as well as the subsidiaries (of the “Company” or the “Group”) shall comply with this Policy.

## 2. OBJECTIVE

The objectives of this Policy are to ensure that the Board, all employees, and officers of the Group to whom this Policy applies, can raise concerns without fear of reprisals and provide a transparent and confidential process for dealing with the concerns.

## 3. COMMITMENT AND COMPLIANCE

It is our commitment to ensure compliance with relevant laws, rules, regulations, and company policies applicable to our business activities. It is the responsibilities of the Company to ensure its Directors and all employees understand, observe, and comply with the laws, rules, regulations, and company policies that are applicable to their specific roles and responsibilities in conducting the business activities with integrity.

It is the Company’s responsibility to prevent violation of the law and voice out for any possible violations within the Company. Should any employee have information regarding the violation or improprieties, he/she should report the matter immediately to the line manager, higher management, or the Board. The Company through its Human Resource (“HR”) Department is responsible to ensure that the principles as set out in this Policy are communicated, understood, and observed by all employees and Directors.

## 4. PRINCIPLES OF THE POLICY

The principles of the Policy are as follows: -

- All concerns raised must be made in writing and it must be made clear that the complainant considers the matter to be one of whistleblowing.
- When reporting a violation or concern - the time, location and nature of the matter, the names of people involved, and other details should be provided so it can be investigated.
- All concerns raised will be treated with the utmost seriousness and strictly confidential unless otherwise required disclosure by the law or court order.

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- The Company will ensure that any individual raising a concern is aware of the person in charge of handling the matter.
- The HR Manager will coordinate with the person in-charge to ensure that the management takes necessary corrective action including, where appropriate, reporting any violation to the relevant federal, state, or other law enforcement, governmental or regulatory authorities.
- Reports filed under this Policy will be controlled and documented by the HR Manager, who shall maintain all related documentations in secured files to which only the HR Manager shall have full access.
- The Company will ensure that no one will be at risk of suffering some form of retaliation as a result of raising concern even if the individual is mistaken.

## 5. REVIEW OF THE POLICY

This Policy shall be reviewed by the Board annually to ensure it remains consistent with the Company's objectives and Board's responsibilities and in line with the relevant laws and legislation.