

GLOSTREXT BERHAD

Registration No. 202201005343 (1451040-T)
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY AND PROCEDURES

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WHISTLE-BLOWING POLICY AND PROCEDURES

This Whistle-blowing Policy is for the internal use of Glostrex Berhad and its subsidiaries (“the Group”). The Group shall review and update this policy from time to time.

1. INTRODUCTION

The management in the Group is committed to promote and maintain the highest standards of integrity, accountability, and transparency at the workplace as well in the conduct of its businesses and operations.

This Whistle-blowing Policy is to facilitate the earliest possible disclosure by the employees, or third parties concerns in a responsible and appropriate manner about possible improprieties without fear of reprisals or detrimental actions against the individual concerned.

2. OBJECTIVES

The objective of this policy are as follows:

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

3. SCOPE

This policy shall apply to all employees under the Group and all third parties who are aware/suspects that an employee is engaged in misconducts.

4. MISCONDUCTS

Misconducts includes the following:

- a. Criminal offence under the law, such as fraud, corruption, forgery, cheating, criminal breach of trust, insider dealing, abetting, or intending to commit criminal offence.
- b. Misuse of Company’s resources or assets and confidential information.
- c. Intentional destruction of Company’s property.
- d. Failure to comply with legal or regulatory obligations.
- e. Damage to the environment.

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

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

5. REPORTING A VIOLATION

An employee may raise a report of any violation to his/her Head of Department unless the violation was committed by the same person, in such cases, the employee shall inform any of the Directors. If he/she is unable to do so, then he/she must raise it with the Chairman of the Audit and Risk Management Committee.

Investigation procedure is to make a report. The report shall include:

- a. Details of the person(s) involved.
- b. Details of the allegations.
 - ❖ nature of the allegation.
 - ❖ where and when the alleged misconduct/wrongdoing took place.
- c. Supporting evidence if available.
- d. Name, Designation, Office Contact/Mobile of the staff making the report.

The details of the staff making the report shall be keep confidential to ensure the staff is free from reprisal. For third parties making the report, it shall be directed to the Chairman of Audit and Risk Management Committee directly. The investigation outcome will then be communicated to the whistle-blower within 7-14 working days.

6. PROTECTION

Under the Whistle-blowing Policy of the Group, the staff shall be accorded the necessary protection against any reprisals or retaliation including any form of harassment or victimisation from anyone within the group because of his/her reporting, provided the reporting is made in good faith.

The identity of the staff shall be kept with utmost confidentiality and shall only be released with the consent of the said staff. This shall apply whether such disclosure resulted in the prosecution or disciplinary action against the guilty party or not.

However, the protection of the whistle-blower will be revoked under the following circumstances:

- a. The reporting staff participated in the activities contributing to the misconduct except for circumstances where he/she must under duress or coercion.
- b. The report is false in nature and done with malicious intents or motivated by personal agenda or ill will.

c. The report is of a frivolous or vexatious nature.

7. ADMINISTRATION

The staff 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.

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.

END