

# WHISTLEBLOWER POLICY

## 1. PURPOSE

The purpose of this policy is to establish a transparent and accountable communication channel for employees and stakeholders to voice their concerns in an effective, responsible, and secure manner when they become aware of actual or potential wrongdoings.

This policy reaffirms Strateq Group commitment to good corporate governance and is intended to provide a framework to promote responsible and secure whistleblowing, without fear of reprisal, discrimination, or adverse consequences. The procedures set out in this policy allow employees and anyone outside of Strateq to report any concerns or complaints in relation to any irregularities, inappropriate behavior, legal or ethical violation or other serious breaches of internal processes in a responsible manner. This policy also permits Strateq Group to address such concerns or complaints by taking appropriate corrective or remedial action. Frivolous and bogus complaints will be disregarded.

This policy is not a means for a disgruntled individual to abuse and is also not a route for taking up personal grievances.

## 2. SCOPE

This policy applies to all employees in Strateq Group including contractors, consultants, part-time, interns, and other personnel that are affiliated with Strateq.

It also applies to all external parties such as customers, suppliers, contractors, and other stakeholders who may have a business relationship with Strateq Group.

## 3. DISCLOSURE OF IMPROPER CONDUCT

Strateq Group conducts its business with high standards of integrity and honesty and expects the same standards from its clients and business partners. Anyone may make a disclosure of improper conduct to any enforcement agency, or by the whistleblower channels outlined in this policy based on reasonable belief that any person has engaged, is engaging, or is preparing to engage in improper conduct.

The following is a non-exhaustive list of concerns that may be raised under this policy:

- 1) Incidents of fraud, corruption or bribery;
- 2) Abuse of Power;
- 3) Breach of Law, Criminal offences;
- 4) Misuse of Strateq's Property;
- 5) Non-Compliance with Strateq policies, practices, procedures or other rules of conduct;
- 6) Improprieties in matters of financial reporting;
- 7) Situations which pose a danger to the health or safety of any individual or significant danger to the environment;
- 8) Detrimental action taken against whistleblower (including person closely associated).

## 4. WHISTLEBLOWER PROTECTION

Under The Act, a whistleblower shall be conferred with protection under this Act as follows:

- a) protection of confidential information;
- b) immunity from civil and criminal action; and
- c) protection against detrimental action, the protection shall be extended to any person related to or associated with the whistleblower.

A whistleblower protection conferred under this section is not limited or affected in the event that the disclosure of improper conduct does not lead to any disciplinary action or prosecution of the person against whom the disclosure of improper conduct has been made. The Act does not limit the protection conferred by any other written law to any person in relation to information given in respect of the commission of an offence.

Simultaneously, Strateq is 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. There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need-to-know basis (e.g., requirement to testify in court). If such a situation arises, Strateq shall discuss and seek consent with the whistleblower first before proceeding with the case.

Strateq is also committed to protect the whistleblower against detrimental action (e.g., demotion, suspension or termination of employment or service) and all acts of harassment, retaliation, victimisation, and recrimination arising from making the disclosure in good faith.

## 5. REVOCATION OF WHISTLEBLOWER PROTECTION

Strateq in accordance with The Act shall revoke the whistleblower protection conferred when:

- I. The whistleblower has participated in the improper conduct;
- II. The whistleblower wilfully made in his disclosure of improper conduct a material statement which he knew or believed to be false or did not believe to be true;
- III. The disclosure of improper conduct is frivolous or vexatious;
- IV. The disclosure of improper conduct principally involves questioning the merits of government policy, including policy of a public body;
- V. The disclosure of improper conduct is made solely for personal gain or interest or substantially with the motive of avoiding dismissal or other disciplinary action; or
- VI. The whistleblower, in the course of making the disclosure or providing further information, commits an offence under The Act.

## 6. REPORTING CHANNELS

6.1 When an employee or an individual who is not an employee has witnessed or becomes aware of a reportable incident involving ethical and legal violations or inappropriate behaviour, he or she may raise the matter via any of the following reporting channels:

- I. by emailing [strateq\\_whistleblower@strateqgroup.com](mailto:strateq_whistleblower@strateqgroup.com)
- II. by using the [Whistleblowing form](#) and mail it to:  
Strateq Sdn. Bhd.  
No. 12, Jalan Bersatu 13/4, 46200 Petaling Jaya,  
Selangor Darul Ehsan.  
Attention: Group Managing Director
- III. Apart from the reporting channels above, employees may also choose to raise any concerns to their immediate superior or escalate their concerns to their next-level superior. All such complaints raised will be channelled to the Whistleblowing Committee, who will review the complaints and determine the appropriate follow-up action.

6.2 The Whistleblowing Committee shall comprise of the following:

- I. Chairman of the Board
- II. Group Managing Director
- III. Chief Financial Officer
- IV. Human Resource Head
- V. Company Secretary
- VI. Compliance Department Head

## 7. INVESTIGATION AND FOLLOW-UP ACTION

All complaints will be promptly and thoroughly investigated, and the investigation will be dealt with in confidence and on a need-to-know basis.

The Whistleblowing Committee will review the complaint and decide on the necessary course of action.

Where an investigation is deemed necessary, the outcome of the investigation may be reported to the law enforcement agency.

## 8. REQUIRED EVIDENCE

The Whistleblower should be able to provide the disclosure in writing, information regarding the type of activity or conduct, identity of the person(s) suspected of being involved, when it occurred and who was affected.

The Whistleblower must have first-hand knowledge or information of the facts, i.e., information obtained from third party or 'hearsay' will not be entertained. However, the Whistleblower should not be discouraged from making a report because they are unsure whether there is sufficient evidence to support their allegations.

## 9. REVIEW OF THIS POLICY

Strateq can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and

regulations and/or accommodate organizational changes within the Company or Group.

In the event there are discrepancies between this Policy and the Whistleblower Protection Act 2010 ("The Act"), the Act shall prevail.

## **10. REFERENCE**

- Law of Malaysia Act 711 (Whistleblower Protection Act 2010)
- Strateq Anti-Bribery and Corruption Policy