



WTEC GROUP BERHAD

202401017425 (1563275-K)

WANMEI SPECIALTY TECH SDN. BHD.

201001036557 (920480-V)

WTEC SDN. BHD.

200101028926 (564684-H)

WHISTLEBLOWING POLICY

24TH AUGUST 2024



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WHISTLEBLOWING POLICY

1.0 INTRODUCTION

WTEC Group Berhad being the parent company of WTEC Sdn. Bhd. which is formerly known as Wansern Technology Sdn. Bhd. is committed to achieving and maintaining high standards of corporate governance and professional responsibility in all its dealings in general.

2.0 DEFINITION

a) **Whistleblower**

Anyone making a Protected Disclosure under this policy

b) **Protected Disclosure**

Means a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected disclosure should be factual and not speculative in nature.

3.0 OBJECTIVES

WTEC is committed to ensuring that there is an adequate mechanism for employees and other interested parties to address any serious concerns relating to matters covered by Group's Code of Conduct, legal issues and accounting, financial or audit matters.

The intended objectives of this policy are:

- i. To provide avenues for employees to raise their concerns and define ways to handle these concerns;
- ii. To enable Management to be informed at an early stage about acts of misconduct of offences;
- iii. To reassure employees that they will be protected from punishment or unfair treatment for disclosing concerns in good faith in accordance with this procedure; and
- iv. To help develop a culture of openness, accountability and integrity

4.0 SCOPE

This policy applies to all directors and employees of the group.

5.0 WHISTLEBLOWING POLICY

WTEC requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the WTEC Group, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Reporting Responsibility.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that WTEC Group can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of WTEC Group's code of ethics or suspected violations of law or regulations that govern WTEC Group's operations. No Retaliation. It is contrary to the values of WTEC Group for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports such misconduct, improper or illegal activities include the following:

- i. Fraud;
- ii. Bribery;
- iii. Abuse of Power;
- iv. Conflict of Interest;
- v. Theft or embezzlement;
- vi. Misuse of Company's Property;
- vii. Non compliance with procedure
- viii. Any regulation governing the operations of WTEC Group Berhad

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under WTEC Group's Code of Conduct or any criminal offence under relevant legislations in force. Whistle-blowers are not required to prove the cases but rather to provide sufficient information or evidence for the management to take appropriate actions. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Practice open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their superior. If you are not comfortable speaking with your superior or you are not satisfied with your superior's response, you are encouraged to speak with the Manager or Managing Director. Superiors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the WTEC Group's Managing Director who has the responsibility of investigating all reported complaints.

6.0 REPORTING PROCEDURE

Generally, the reporting process should take the following recommended route as prescribed below:

- i. Raise the Reported Disclosure concern first with the immediate Line Leader, Supervisor, or Senior Supervisor within the department.
- ii. However, should the matter being reported involve directly the relevant Manager and/or Senior Manager, then the matter should be reported to the respective Head of Department (HOD).

If the matter concerned raised with the Department's HOD or simultaneously/ subsequently to HR/Admin and Internal Control and feel that the issue has not been dealt with appropriately, therefore, the Whistleblower should then or also report the matter to the Directors.

On reporting, if it is necessary to report such concern anonymously, the Whistleblower may do so. However, do bear in mind that it is generally easier to investigate and resolve issues if the Whistleblower's identity is known. Furthermore, appropriate feedback of the investigations may be shared with the Whistleblower.

Whenever possible, the whistleblower should report the matter in writing and provide all the supporting documentation. If this is not possible, oral reporting is acceptable.

iii. Investigation

The investigation will be concluded within a reasonable time frame commensurate with the matters disclosed in the Protected Disclosure.

If, based on the findings found that there is no basis to the allegations of wrongdoings and further found that:

- ❖ The Protected Disclosure by the Whistleblower is done in good faith, then a notice in writing shall be issued to the Whistleblower and the matter will be closed; or
- ❖ The Protected Disclosure by the Whistleblower is NOT done in good faith, then the matter will be referred to Human Resources/ Administrative to consider whether appropriate disciplinary action may be taken.

The results of the finding or outcome will be made available and brought to the attention of the Company's Top Management.

Appropriate feedback will be given to Whistleblower, if his or her identity is known.

iv. Legal Obligations

This policy does not affect the rights or obligations of Whistleblower to report a criminal matter or other matter requiring disclosure to an external party as may be required by the Law.

7.0 CONFIDENTIALITY

- i. The company shall treat all reports or disclosures as sensitive and confidential and will only reveal information if required by law, court or relevant authority.
- ii. The identity of the Whistle-blowers shall also be kept private and confidential unless the Whistle-blowers choose to reveal their identity.
- iii. Where the Whistle-blowers have chosen to reveal their identity when making such a report, written permission from the Whistle-blowers must be obtained before information is released.

8.0 ASSURANCE AGAINST REPRISAL AND/OR RETALIATION

- i. This policy is intended to protect genuine whistleblowers from any unfair treatment reprisals, retaliation, discrimination or adverse employment.
Consequences because of their disclosure, which should be communicated in good faith.
- ii. The group provides assurance that there will be no disciplinary action taken against the Whistleblowers as long as they act in good faith and do not make false accusations when reporting.
- iii. A whistle-blower who knowingly or recklessly makes statements or disclosures that are not in good faith may be subject to disciplinary procedures, which may include termination.

9.0 ADMINISTRATION

Reports should be sent directly to Human Resources/Admin which will be reported directly to the Group's Top Management. The contact information of the responsible member is as follows:

HR & Admin Manager – Ms. Chieu
Email: pychieu@wtecgroupp.com.my

HR Jr. Executive – Ms. Dahliani
Email: hr1@wtecgroupp.com.my

Reports may also be sent to the Head of Department or anyone in Senior Management.

A handwritten signature in black ink, appearing to be 'Saverio', written over the printed name 'Managing Director'.

Managing Director

WTEC Group Berhad

PT1558, Kawasan Perindustrian Kajang Jaya,
43500 Semenyih, Selangor, Malaysia.

Date: 24/08/2024

APPENDIX

APPENDIX I: FORMAT OF WHISTLEBLOWING REPORT**WHISTLEBLOWER REPORTING FORM**

Please provide the following details for any suspected Misconduct and submit it directly to the HR department. Please note that you may be called upon to assist in the investigation, if required.

<u>Whistleblower's Contact Information</u>			
Name:			
Contact Number:		Email Address:	
<u>Suspect's Information</u>			
Name:			
Functional Title:			
Division & Department (where applicable):			
Contact Number:		Email Address:	
<u>Witness(es) Information (if any)</u>			
Name (1):			
Division & Department (where applicable):			
Contact Number:		Email Address:	
Name (2):			
Division & Department:			
Contact Number:		Email Address:	

Complaint:

Briefly describe the Misconduct and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.

1) What was the Misconduct which had occurred?

2) Who had committed the Misconduct?

3) When did it happen and when did you notice it?

4) Where did it happen?

5) Is there any evidence that you could provide?

6) Are there any other parties involved other than the suspect stated above?

7) Do you have any other details or information which would assist us in the investigation?

8) Any other comments

Date:

Signature:

For Human Resources Use	Complaint No.
Received By:	Received On:
	Acknowledgement Sent On:
Investigation Required (Yes/No)? (If no, please state the reason)	
Investigation To Be Done By:	
Investigation Results:	
Action Taken/Conclusion:	
Signed Off By:	Reviewed & Approved By (Top Management):