



SNS NETWORK TECHNOLOGY BERHAD
[201601002835 (1173761-W)]
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

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1.0 INTRODUCTION

SNS Network Technology Berhad (“**SNS**” or “**the Company**”) and its subsidiaries (collectively, “**SNS Group**”), recognises the importance to provide an avenue for all its employees to speak up. Hence, Whistleblowing policy has been established in good faith with reasonable belief that the information and allegation is true and not made with bad intentions for personal interest or gain. Any disclosure of information will be treated with utmost confidentiality and be assured that all persons involved in handling the case are also required to maintain the strictest level of confidentiality.

2.0 OBJECTIVE

The objective of this Whistleblowing Policy & Procedure (WBPP) is to provide an avenue for the Group’s employees and business partners as well as the members of the public to alert the organisation in the event its stakeholders are acting or being treated in injustice manner or at risk of harm.

3.0 WHISTLEBLOWING COMPLAINTS

Complaint shall be a disclosure of improper Conduct made by a Whistleblower. Whistleblowers could lodge complaint(s) as and when they come across any wrongdoings, injustice treatment or any action that fits whistleblowing definition, including but not limited to:

- a) Fraud
- b) Theft
- c) Misappropriation of assets
- d) Criminal breach of trust
- e) Bribery
- f) Acts or omission endangering individual’s health or safety or any individual or significant danger to the environment
- g) Harassment and/or Sexual harassment
- h) Noncompliance with the laws, regulations, regulatory requirements, misconducts or any acts or omission against the Group’s interests
- i) Disclosure of Group’s information without proper authorization
- j) Abuse of power
- k) Questionable and improper accounting

- l) Breach of The Group's policy
- m) Profiteering as a result of insider knowledge
- n) Misrepresentation or false statements to or by the staff or officer of The Group
- o) Violation of human rights
- p) Forgery
- q) Attempt conceal information relating to improper conduct
- r) Defamation or circulation of untrue information or rumours

4.0 CONFIDENTIALITY AND ANONIMITY

All whistleblowing reports are treated with utmost confidentiality and or anonymously and without revealing the whistleblower's identity, to the extent permitted by law. The whistleblower is to be given an assurance that his/her identity will be only known to Whistleblowing Committee on a need to know basis and for investigation purpose.

5.0 SCOPE

The WBP applies to all staffs and interns including other business associates and members of the public.

6.0 ANONYMOUS WHISTLEBLOWER

To ensure all reports are being investigated in fair and reasonable manner, the Whistleblower is encouraged to disclose his/her personal details so that the process of obtaining more information on the allegation can be performed. This is also to ensure that the Group is able to accord necessary protection to the Whistleblower under this WBP.

7.0 PROTECTION TO WHISTLEBLOWER

All whistleblowing reports shall be made with good faith in the best interest of the Group and not for any personal gain of the employee whistleblower; otherwise, disciplinary action may be taken against the employee whistleblower.

This WBP provides assurance that no action shall be taken against the employee whistleblower in accordance with section 587 of the Companies Act 2016 and the Whistleblower Protection Act 2010 and the employee whistleblower shall be protected

against reprisals, adverse employment consequence, or retaliation and provided with immunity from disciplinary action from the whistleblower's immediate superior or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:

- a) The whistleblowing report is made in good faith with reasonable grounds and justification that the information and any allegation in it are true;
- b) The employee whistleblower does not make a false or misleading report knowingly, negligently, frivolously, or recklessly; and
- c) The whistleblowing report is not vexatious, made with malicious or ill will or made for any personal gain of the employee whistleblower.

8.0 ENFORCEMENT AGENCY

An enforcement agency is defined under the Whistleblower Act 2010.

9.0 REPORTING CHANNEL

Disclosure can be made by submitting the complaints together with the supporting documents via email to **honesty@sns.com.my** or by mail in sealed envelope addressed to the below address:

**SNS Network Technology Berhad
No 61 Jalan Sultan Nazrin Shah
30250 Ipoh, Perak, Malaysia
For Attention of The Whistle Blowing Committee**

10.0 REVIEW

This policy shall be reviewed as and when required by Board of Directors.