



WHISTLEBLOWING POLICY AND PROCEDURES

AUGUST 1, 2024
VERSION 1.0

1. BACKGROUND AND PURPOSE OF WHISTLE-BLOWING POLICY

SecIron (Malaysia) Sdn. Bhd. (“Company” or “SecIron”) is committed to the values of transparency, integrity, impartiality and accountability in the conduct of its business and affairs, and in its workplace.

For this purpose, SecIron has developed procedures or mechanisms to facilitate:-

- a. reports by Whistle-blowers of any suspected or actual wrongdoings on a confidential basis;
- b. investigation of such reports by the Prescribed Officer; and
- c. protection against reprisal to Whistle-blower who reported in good faith.

This Policy does not replace or affect the Company’s Code of Conduct or other policies and procedures established or to be established by the Company from time to time.

In this Policy, “Group” means SecIron (Malaysia) Sdn. Bhd. and its subsidiary companies and “Group Company” means any company within the Group; “Prescribed Officer” means the person authorised to receive reports on Whistleblowing matters; “Chief Executive” means the Group Chief Operations Officer of SecIron; “Board of Directors” means the Board of Directors of SecIron (Malaysia) Sdn. Bhd.; “Policy” means this Whistleblowing Policy, as may be revised and amended from time to time.

2. REPORTING PROCEDURES

a. Who can disclose

Any of the following persons (“Whistle-blower”) can make a report directly to the Company of any suspected or actual Wrongdoing that is being or had been or about to be committed, provided always that the Whistle-blower has unequivocally decided not to rely on or be protected by the provisions of the Whistle-blower Protection Act 2010 (“Act”):-

- the Group’s employees, including employees on contract, temporary or short-term employees and employees on secondment;
- the Group’s third-party service providers, independent contractors, vendors and suppliers; and
- members of the public.

b. What to disclose

A report can be made if it relates to any conduct which if proved, constitutes a disciplinary offence or a criminal offence by any employee or director within any Group Company (“Wrongdoing”). Wrongdoing includes, but is not limited to:-

- taking or giving favours, kickbacks, bribes and privileges;
- corruption or fraud;
- misappropriation of funds;
- misuse of funds or assets;
- theft or embezzlement;
- gross mismanagement;
- abuse of power by any director or officer of any Group Company;
- serious financial irregularity or impropriety;
- serious breach of Company’s Code of Conduct;

- act, omission, misrepresentation or concealment of information which lead to, cause or create a substantial or specific danger to the lives, health, or safety of the Group Company's employees, the public or the environment;
- failure to comply with provisions of laws, regulations and directives where the wrongdoer knowingly or intentionally disregards compliance with such provisions;
- disciplinary offence or criminal offence;
- sexual harassment;
- breach of customer confidentiality or privacy; and
- knowingly directing or advising a person to commit any of the above Wrongdoing

Wrongdoing excludes any matters which are:-

- trivial or frivolous in nature;
- motivated by malice; and / or
- based on rumour, conjectures or hearsay

If an Employee is unsure whether a particular act or omission constitutes a Wrongdoing under this Policy, that Employee is encouraged to seek advice or guidance from his or her immediate superior or head of department.

c. When to disclose

As soon as a Whistle-blower becomes aware and reasonably believes in good faith that a Wrongdoing is likely to happen, is being committed or has been committed, the Whistle-blower may elect to lodge a report of the Wrongdoing.

The Whistle-blower needs to demonstrate that the Whistle-blower has reasonable grounds for the concerns. However, the Whistle-blower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a disclosure. If the Whistle-blower knows as a matter of fact that there are reasonable grounds of suspicion that a Wrongdoing is going to take place, such genuine concerns is encouraged to be raised at an early stage.

d. How to make a report

Before a report of any Wrongdoing is made to the Group Company, the Whistleblower must firstly be notified through this Policy or such other means that should he proceed to do the same, he will not be able to invoke or rely on the protection / safeguards accorded or stipulated in the Act. Should the Whistle-blower still insist on making disclosure of a Wrongdoing, the Whistle-blower can thereafter make the said disclosure to the following persons via email or by letter as set out below:

1. Audit Committee Chairman : Wang Wen Hong
2. Group Chief Operations Officer : Nicole Ban
3. The Prescribed Officer
 - i. Via email:
 1. Audit Committee Chairman : wenhong.wang@seciron.com
 2. Group Chief Operations Officer : nicole.ban@seciron.com
 - ii. Via letter

Addressed to the above named persons and delivered to the Registered Office of the Company at SO-30-2, Menara 1 Strata Office KL Eco City, No. 3 Jalan Bangsar, Kampung Haji Abdullah Hukum, 59200, Kuala Lumpur, Malaysia.

iii. Via submission of online form:

Kindly fill in the form below on the information that you wish to bring to our attention.

We will process your information as soon as possible and revert to you on the status.

Please note that should you choose to remain anonymous, we will not be able to revert to you.

Name of person making the allegation/report:	Contact number
<input type="text"/>	<input type="text"/>
Email	Nature of Allegation
<input type="text"/>	Fraud ▼
Description of allegations/reports*: (Please provide as much details as possible, including evidence of your allegations/reports if any)	
<input type="text"/>	
<input type="button" value="Choose Files"/> No file chosen	

If the Wrongdoing involves the Chief Executive or a Director, the Whistle-blower is to report the matter in writing to any other Director of SecIron.

In order for the Group Company to investigate the Wrongdoing reported, the Whistleblower is to provide the following particulars in the report:-

- particulars of Whistle-blower i.e. name, MyKad No., designation (if the Whistleblower is an Employee of any Group Company) and contact particulars (email, telephone or mobile number and/or address);
- details and description of the Wrongdoing, including, its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if Whistle-blower is not able to identify the identity of the person(s) involved;
- particulars of witnesses, if any; and
- particulars or production of documentary evidence, if any.

The personal details provided by and identity of the Whistle-blower will be kept private and confidential. The Whistle-blower may be asked to provide further clarification and information from time to time, if required of necessary, during the course of investigation.

3. INVESTIGATION

- a. The Prescribed Officer who receives the report will assess the report to determine whether it is related to a Wrongdoing or excluded from the scope of this Policy and shall make general recommendations to the Audit Committee (“AC”), who may designate any person, from the Group Company or external party, to conduct any investigation or to carry out any other process pursuant to this Policy (for instance, any meeting or an internal audit).

- b. The Board of Directors has the authority to make the final decisions including, but not limited to, any of the following:-
- rejection of the report;
 - directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
 - resolution without recourse to an investigation;
 - directing investigations on the report and any persons involved or implicated;
 - suspending the alleged wrongdoer or any other implicated person from work to facilitate any fact finding or to avoid any Employee's exposure to threat or harm;
 - obtaining any other assistance (for instance, external auditors or legal advice); and
 - referral to the police or any other appropriate enforcement authority.
- c. If the Wrongdoing involves the Chief Executive or a Director, the report shall be made to another Director of SecIron who shall refer this to the Board of Directors. The Board of Directors shall then authorise a SecIron Director to be responsible for the investigation and recommendation to the Board of Directors. The Board of Directors shall have the authority to make the final decisions regarding the disclosure of Wrongdoing.
- d. It is intended that the disclosures by the Whistle-blower will be acted upon in a timely manner.
- e. The Whistle-blower and the alleged wrongdoer are expected to give their full cooperation in any investigation or any other process carried out pursuant to this Policy. They may be asked to attend a meeting to discuss the allegations and must take all reasonable steps to attend the meeting. The alleged wrongdoer will be given opportunity to answer the allegations made against him at the meeting.
- f. If the Whistle-blower is also implicated or discovered to be or have been involved in the Wrongdoing which he discloses or any such other Wrongdoings (whether related or otherwise), the Whistle-blower shall also be investigated so as to complete the factfinding process and pursuant to this Policy. An investigation in this instance is not and shall not be treated as a reprisal against or an act to punish the Whistle-blower, but to facilitate all necessary investigations and final decision making pursuant to this Policy.

4. PROTECTION UNDER THIS POLICY

- a. Notwithstanding the fact that the Whistle-blower unequivocally elects to make direct disclosure to the Group Company instead of the enforcement agencies under the Act, any such disclosure made bona fide, based on reasonable grounds and in accordance with the procedures stated in this Policy:
- i. the Whistle-blower shall still be protected from Detrimental Action within the Group as a direct consequence of the Whistle-blower's bona fide disclosure.

In this Policy, "Detrimental Action" may include any of the following:-

- action causing injury, loss or damage;
- intimidation or harassment;
- interference with the lawful employment or livelihood of any person, including discrimination, discharge, demotion, suspension, disadvantage, termination or

- adverse treatment in relation to a person's employment, career, profession, trade or business or the taking of disciplinary action; and
- a threat to take any of the above actions.

- ii. the Whistle-blower's personal details and identity shall be protected, i.e. kept confidential unless otherwise required by law or for the purpose of any proceedings by or against any Group Company.
- b. If Whistle-blower (being an Employee), in good faith, reasonably believes he/she is being subjected to Detrimental Action from any person within the Group Company as a direct consequence of having made a disclosure under this Policy, he/she may consult the Prescribed Officer in confidence. The Company does not permit Detrimental Action of any kind against the Whistle-blower for complaints submitted hereunder that are made in good faith. Any such Detrimental Action meted out shall in itself be considered a material breach of this Policy. A Detrimental Action by any person against the Whistle-blower may result in disciplinary action against that person, including any of the following - issuance of formal warning or reprimand, suspension or termination of employment or service with the Group Company.
 - c. The Group Company reserves the right to revoke the Whistle-blower protection accorded under this Policy if the Whistle-blower has, or is found to have:-
 - participated in the Wrongdoing; and / or
 - made a false disclosure not in accordance with the requirements of this Policy (including but not limited to such disclosures which are based on falsification of facts and information or which contain any element of dishonesty, willful, mischievous or malicious intent made to cause disrepute or injury or damage to anyone being complained against).

In the event of revocation of protection by the Company, the Whistle-blower shall be notified in writing of the same immediately. In addition, the Group Company reserves the right to take such legal or other actions or disciplinary measures against the Whistle-blower (if the Whistle-blower is an Employee), including issuance of formal warning or reprimand, suspension or termination of employment or services with the Group Company.

5. CONFIDENTIALITY

- a. All reasonable steps shall be taken to maintain the confidentiality and identity of the Whistle-blower and report made by the Whistle-blower, unless:-
 - the Whistle-blower expressly waives such rights and states to that effect in writing; or
 - otherwise required by law or pursuant to such order or judgement granted by any court of law.
- b. The Whistle-blower or any person who is involved in the investigation process, shall not reveal, disclose or disseminate to third parties any information or documents or recording or details regarding the Wrongdoing or any part thereof, including but not limited to the status or outcome of an investigation into it, save and except:-
 - to those who are authorised to receive the same under this Policy; or
 - by lodging a report with an enforcement agency in accordance with the Act or any other applicable law; or

- on a strictly confidential basis to an advocate and solicitor for purpose of obtaining legal advice.
- c. The Whistle-blower shall not:-
- contact the suspected individual to determine facts or demand restitution; and,
 - discuss the case, facts, suspicions, or allegations with anyone except to assist in the investigations.

6. REVIEW OF POLICY

This Policy may be reviewed and amended, at the Board of Directors' discretion from time to time, as and when necessary, to ensure its relevance and effectiveness in keeping with the Group's changing business environment, administrative or operational needs as well as changes to legislations. Changes to the Policy, if any, shall only be made with the Board of Directors' approval in writing.