

WHISTLE-BLOWING POLICY

Privasia Technology Berhad (“PTB”) is committed to promoting and maintaining the highest possible standards of openness, transparency, corporate governance and accountability with regards to behaviour at work, quality service to the public and in its working practices. Employees and vendors are expected to conduct themselves with integrity, impartiality and honesty. PTB encourages the reporting of genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work without fear of reprisal or victimisation.

This page serves as a guideline for the PTB’s stakeholders to report a Whistle-blowing complaint to the management of PTB for action.

Types of concerns

This policy applies to all stakeholders (shareholders, directors, employees, partners, contractors, suppliers, clients/customers, government parties, professional organizations, associated companies) related to the PTB’s Group (which shall include parent company, subsidiaries and associated companies) (“PTB Group”).

Types of concerns include:

- conduct which is an offence or constitutes a breach of law (whether civil or criminal) such as fraud, corruption, forgery, cheating, criminal breach of trust, insider trading, abetting or intending to commit offence;
- failure to comply with any legal obligations (whether contractual or statutory) which may be imposed on the stakeholders;
- conduct which is in contravention of PTB Group’s established written policies and guidelines and/or any conduct which undermines the ethical values of the PTB Group, i.e. integrity, honesty, accountability, transparency, fairness and the like even though there may not (yet) be any laws or procedures governing such unethical conduct;
- conduct in relation to miscarriages of justice;
- any action which creates health and safety risks (actual or potential), including risk to the public as well as other employees;
- damage to the environment;
- unauthorized use or misappropriation of public funds, PTB Group’s resources or intended destruction of PTB Group’s property; possible fraud and corruption;

- sexual, physical or other abuse of clients/customers/employees;
- other unethical conduct;
- commercial crime;
- breach of PTB Group's policies;
- acts or omissions which are deemed to be against the interest of PTB Group, laws, regulations or public policies; or
- any attempt to conceal or suppress information relating to the above.

Confidentiality

Every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you or any person who is involved in the investigation process will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. Your role as the whistleblower could become apparent to third parties during the course of an investigation. In such circumstances, we will make efforts to inform you that your identity is likely to be disclosed and that all reasonable steps will be taken to protect you from any victimization or detriment as a result of having made a disclosure. You as the whistleblower should not contact the suspected individual in an effort to determine facts or demand restitution and should not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the PTB Group.

Acting in good faith and protection against retaliation

As a first step, you should normally raise concerns with your immediate supervisor/ manager or their superior. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. PTB expects all parties to act in good faith and have reasonable grounds when reporting a Whistle-blowing complaint. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

Any employee who discloses wrongdoing or improper conduct in good faith and in compliance with the provisions of this policy shall be protected against any act of retaliation. For the purposes of this policy, "retaliation" is defined as any action or

threat of action which is unjustly detrimental to the whistleblower because of his/her report, including, but not limited to, harassment, discrimination and acts of vindictiveness, direct or indirect, that are recommended, threatened or taken against the whistleblower.

No immunity

Reporting under this policy, however, in no way immunises or shields the whistleblower against action following his or her intentional wrongdoing or improper conduct.

Whistle-blowing channel

The channel will be directly to a firm of independent professionals who will report directly to the members of the Audit and Risk Committee.

Any report can be submitted confidentially via email to ptb@reportingmail.com

The following information must be available:

- Background of the individual initiating the allegation
- Date(s), details and reasons why the individual is concerned about the conduct

For further information, please visit www.reportingmail.com

Where relevant, the individual may be requested to submit evidences and documents. Any meetings arranged will be conducted discreetly and if necessary, off-site or out of the office premises.

PTB reserves the right to amend the policy and procedure as necessary to meet any change in requirements.

Whistleblower Protection Act 2010

In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the Act shall prevail.