

## **WHISTLEBLOWING POLICY**

### **1. POLICY STATEMENT**

RGT Berhad Group of Companies (“RGTBHD Group” or “the Group”) is committed to carrying out its business in accordance to the highest standards of professionalism, honesty, integrity and ethics.

The policy is: -

- To help develop a culture of accountability and integrity within RGTBHD Group of Companies.
- To provide a safe and confidential avenue for all employees, external parties and other stakeholders to raise concerns about any poor or unacceptable practice or misconduct
- To reassure whistleblowers that they will be protected from detrimental action or unfair treatment for disclosing concerns in good faith;
- To deter misconduct and promote standards of good corporate practices.

### **2. SCOPE OF THE POLICY**

This Policy governs the disclosures, reporting and investigation of misconduct within the Group as well as the protection offered to the persons making those disclosures from detrimental action in accordance to Whistleblower Protection Act 2010.

The scope of the policy applies to RGTBHD Group's staff, Board members and other stakeholders.

Misconduct includes:

- suspected criminal offence;
- contravene any of the requirements and standards of a regulatory body, professional body, government or its agencies;
- impropriety, corruption, acts of fraud, theft and misuse of the Company's properties/resources;
  - abuse of power or authority;
- serious conflicts of interest without disclosure;
- sexual harassment:
- bribery, blackmail and miscarriage of justice;
- attempts to suppress or conceal any information relating to any of the above;  
and inappropriate business practice.

### **3. PROTECTION TO WHISTLEBLOWER**

It is the Group's policy to provide the whistleblower protection in term of confidentiality of information and safeguard the whistleblower from any act of interference that may be detrimental to the whistleblower. The Group assures that all reports will be treated with strict confidentiality and upon verification of genuine cases, prompt investigation will be carried out.

### **4. PROCEDURES OF WHISTLEBLOWING**

Any person may report allegations of suspected serious misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Any anonymous disclosure will not be entertained. However, the Company reserves its right to investigate into any anonymous disclosure.

**5. NOTIFICATION ON THE OUTCOME OF THE DISCLOSURE**

The Group reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owned to someone else.

**6. PROCEDURES OF WHISTLEBLOWING POLICY**

Disclosures can be made via email at [antibribery@rgt.com.my](mailto:antibribery@rgt.com.my).

Whistleblower is required to identify and provide details pertaining to the issue/allegation.

Scope of Reporting Whistleblowers should note that:

- it is best to raise any concern early and identify or supply as much factual and verifiable facts and objective information pertaining to the issue/allegation;
- if desired the reporting/informing may be done anonymously;
- to safeguard the abuse of this disclosure process; a malicious or knowingly false complaint will not be entertained or may lead to disciplinary/legal proceedings; and
- investigation/verification proceedings must not be discussed or disclosed to any other personnel in order to protect the integrity and confidentiality of the matter.

**7. INVESTIGATION PROCEDURES**

There are various methods of investigation to be carried out (where applicable based on case to case basis) when the matters as follows:

- Investigation internally;
- Seeks advise from police, Internal Auditor or External Auditor;
- Refer to the public cases;
- From the subject of an independent inquiry, or
- Any appropriate methods as may be adopted for the solution on case to case basis.

The Internal Auditor or Independent Non-Executive Director or the person designated to investigate the complaint (Investigation Team) will write to the reporting individual wherever reasonably practicable of the concern being received, for the purposes of acknowledging that concern has been received; advising whether or not the matter is to be investigated further and if so what the nature of the investigation will be; giving an expected time of the investigation will take to provide the final response.

The conduct complained constitutes an improper conduct, the Audit Committee shall initiate disciplinary proceedings and/or or take such steps as it deems appropriate (including but not limited to making a police report) against the person who had committed the improper conduct.

The Investigation Team will ensure investigations are carried out using appropriate channels, resources and expertise. The Investigation Team will report to the Audit Committee on a periodic basis about the reports received and actions taken. The Audit Committee Members shall meet to discuss about the action/investigation on the reports received from whistleblowers. The Audit Committee may also exclude from its meetings any persons it deems appropriate, depending on the nature of the complaint.

**RGT BERHAD**  
(Company No. 71024-T)  
(Incorporated in Malaysia)

**8. REVIEW OF THE POLICY**

The Board will review this Policy, as appropriate, to ensure the effectiveness of this Policy. The Board will discuss any revisions that may be required and recommend any such revisions to the Board of consideration and approval.