



**RGT BERHAD**

Registration No. 198101004909 (71024-T)  
(Incorporated in Malaysia)

# **WHISTLEBLOWING POLICY**

## 1. Policy Statement & Objectives

RGT Berhad (“**RGTBHD**”) is committed to carrying out its businesses in accordance with the highest standards of professionalism, honesty, integrity and ethics.

This Whistleblowing Policy (“**Policy**”) is applicable across all levels in RGTBHD and all its subsidiary companies (“**RGTBHD Group**” or “**the Group**”).

The objectives of the Policy are:

- to help develop a culture of accountability and integrity within the Group;
- 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; and
- to deter misconduct and promote standards of good corporate practices.

## 2. Scope of the Policy

This Policy governs the disclosures, reporting and investigation of improper conduct or concerns that demonstrates malpractice or impropriety within RGTBHD Group as well as the protection offered to the persons making those disclosures from detrimental action in accordance with Whistleblower Protection Act 2010.

The scope of the policy applies to all employees, Board of Directors of the Company (“**Board**”) and other stakeholders.

This Policy shall cover concerns which may be in the public interest and may at least be investigated separately but could lead to the invocation of other procedures such as disciplinary.

Concern and / or improper conduct may include:

- Criminal activities;
- Contravention of any requirements and standards of regulatory body(ies), professional body(ies), government(s) or its agencies;
- Impropriety, unethical behaviour, bribery, corruption, acts of fraud, theft and misuse of the Group's properties/resources;
- Abuse of power or authority;
- Serious conflicts of interest without disclosure;
- Sexual harassment;
- Danger to health & safety or the environment;
- Blackmail and miscarriage of justice; and
- Attempts to suppress or conceal any information relating to any of the above.

### 3. Safeguards in place

#### Protection

This Policy shall 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 provided that the disclosure is made:

- (a) In good faith
- (b) in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

#### Confidentiality

The identity and particulars of the employee or stakeholder who submitted the whistleblowing report will not be disclosed without prior consent, unless required by law. RGTBHD undertakes to treat all disclosures in a confidential and sensitive manner to protect the identity of the whistleblower. Notwithstanding the assurance, it must be noted that an investigation process may reveal the source of the information and the whistleblower making the disclosure may need to provide a statement as part of the evidence required.

#### Anonymous allegations

The Group encourages reporting whistleblowers to state their names to any disclosures they made as concerns that are expressed anonymously tend to be less credible. Nonetheless, the Company reserves the right and discretion to consider these anonymous reporting after considering the following factors:

- the seriousness and significance of the issues raised
- the credibility of the concern
- the likelihood of confirming the allegations from attributable sources

#### Untrue allegation

No action will be taken against a whistleblower who makes an allegation in good faith and had exercised due care to ensure the accuracy of information, which is not confirmed by subsequent investigation. If, however, a whistleblower makes malicious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

#### 4. Detrimental Action

No person shall take detrimental action in reprisal for a disclosure of improper conduct, against a whistleblower or any person related to or associated with the whistleblower, acting in good faith.

A whistleblower may make a complaint to the Chairman of the Audit Committee of any detrimental action committed by any person against the whistleblower or any person related to or associated with the whistleblower.

A person is deemed to take detrimental action against a whistleblower or any person related to or associated with the whistleblower if—

- (a) the person takes or threatens to take the detrimental action because—
  - (i) a whistleblower has made a disclosure of improper conduct; or
  - (ii) the person believes that a whistleblower has made or intends to make a disclosure of improper conduct; or
- (b) The person incites or permits another person to take or threaten to take the detrimental action for any reason under subparagraph (a)(i) or (ii).

Where the Chairman of the Audit Committee receives a complaint of detrimental action, members of the Audit Committee shall commence investigation into the complaint of detrimental action. If the investigation reveals that:

- (a) the complaint is not substantiated; the Audit Committee shall inform the whistleblower;
- (b) the complaint constitutes an improper conduct; the Audit Committee shall initiate disciplinary proceedings and/or take such steps as it deems appropriate (including but not limited to making police report) against the person who had taken the detrimental action against the whistleblower.

No person, whether acting for his own or acting or purporting to act on behalf of anybody shall—

- (a) terminate a contract;
- (b) withhold a payment that is due and payable under a contract; or
- (c) refuse to enter into a subsequent contract,
- (d) solely for the reason that a party to the contract or an employee or employer of a party to the contract has made a disclosure of improper conduct under this Policy.

#### 5. Procedures under this Whistleblowing Policy

All disclosures are to be directed to the Chairman of the Audit Committee via any of these methods:

- (a) Hard copy to:  
No 1032 (Plot 170 & 170A), Jalan Perindustrian Bukit Minyak, Kawasan Perindustrian Bukit Minyak, Mukim 13, 14100 Bukit Mertajam, Penang, Malaysia.
- (b) Electronically via email to:  
[whistleblowing@rgt.com.my](mailto:whistleblowing@rgt.com.my).

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

Whistleblowers should note the following:

- Disclose background of the whistleblower and individual initiating the allegation;
- State date(s), details and reasons why the individual is concerned about the conduct;
- 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; supporting evidence/proof;
- In order to safeguard against any abuse of this disclosure process; a malicious or knowingly false complaint will not be entertained or may lead to disciplinary/legal proceedings; and
- Any investigation/verification proceedings must not be discussed or disclosed to any other personnel in order to protect the integrity and confidentiality of the matter.

## **6. Investigation Procedures**

Upon receipt by the Chairman of Audit Committee (“**AC**”) of a disclosure of improper conduct, the Chairman will call an AC meeting for the purposes for setting up an Independent Investigation Committee comprising of three senior-level personnel, who then shall be empowered to conduct the necessary investigation and take relevant action which may include appointing external investigation team.

If the report of investigation makes a finding that:

- (a) the disclosure of improper conduct is not substantiated, the AC shall inform the whistleblower;
- (b) the conduct complained constitutes an improper conduct, the AC shall inform and recommend disciplinary proceedings to the Board (excluding any members involved). The Board will then make the necessary decision and/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.

It is noted that the Chairman of the AC retains the right to refer the disclosure of concern or improper conduct to the management if the AC is of the view that management (without any conflict of interest) can more appropriately conduct the investigation.

## **7. 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.

## **8. Approval**

This Whistleblowing Policy is approved by the Board on 29 August 2022.