

GENETEC TECHNOLOGY BERHAD
199701030038 (445537-W)

WHISTLE-BLOWING POLICY

General

Genetec Technology Berhad (“Genetec” or the “Company”)’s Code of Ethics and Code of Conduct (“the Code”) requires the directors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Company, they must practise honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Objective of the Policy

The objectives of Genetec’s Whistle-blowing Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or auditing matters by employees, directors and other stakeholders of the organization, on a confidential basis.
- The receipt, retention, and treatment of complaints received by the Company regarding accounting, internal controls or auditing matters.
- The protection of directors and employees reporting concerns from retaliatory actions.

Scope of the Policy

This policy is to facilitate directors and employees to disclose any misconduct or criminal offence through an internal channel. Such misconduct or criminal offences include the following:

- i. Fraud;
- ii. Corruption, bribery or blackmail;
- iii. Abuse of Power;
- iv. Conflict of Interest;
- v. Theft or embezzlement;
- vi. Misuse of Company’s Property;
- vii. Non Compliance with Procedure.

The above list is not exhaustive.

This Policy is not to invalidate the Disciplinary Action Process and Procedures as reflected in the Employees’ Handbook but to provide more avenues for directors and employees to disclose improper conduct committed or about to be committed to the Company.

No Retaliation

This Whistle-blowing Policy is intended to encourage and enable directors and employees to raise Concerns with the Company for investigation and appropriate action. With this goal in mind, no director, or employee who, in good faith, belief, without malicious intent, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, an employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from his/her position or termination of employment.

GENETEC TECHNOLOGY BERHAD WHISTLE-BLOWING POLICY

Applicability of the Policy

Subject to the requirement of applicable local jurisdiction, this policy applies to all directors and employees of Genetec and its subsidiaries. This policy also applies to members of the public, where relevant.

Reporting Responsibility

Each director, officer and employee or members of the public have an obligation to report in accordance with this Whistle-blowing Policy:

- (a) questionable or improper accounting or auditing matters,
- (b) violations and suspected violations of Genetec's Code, and
- (c) criminal offence.

(collectively referred to as "Concerns").

A whistleblower may submit his Concerns through any of the following channels:-

Phone : 03-89266388 or
Email : whistle@genetec.net or
Post : Lot 7, Jalan P10/11, Seksyen 10, Kawasan Perusahaan Bangi,
43650 Bandar Baru Bangi, Selangor.

Grievance Procedure

Employees

If any employees believe reasonably and in good faith that malpractice exists in the workplace, the employee should report this immediately to the line manager. However, if for any reason the employee is reluctant to do so, then the employee should submit the Concerns to the Head of Human Resources.

If these channels have been followed and employees still have concerns, or if employees feel the matter is so serious that it cannot be discussed with any of the above, they should contact the Audit Committee Chairman (via email at ksteh@genetec.net)/Senior Independent Non-Executive Director, if any.

Directors

Directors should submit the Concerns in writing directly to the Audit Committee Chairman / Senior Independent Non-Executive Director, if any.

Handling Reported Violations

The Audit Committee shall address all reported Concerns. The Audit Committee Chairman shall immediately notify the Audit Committee, the Chairman, the Executive Directors and Chief Operating Officer of any such report. The Audit Committee Chairman will notify the sender and acknowledge receipt of the Concerns within five business days or as soon as practicable.

All reports will be promptly investigated by the Audit Committee, and appropriate corrective action will be recommended to the Board of Directors if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concerns.

GENETEC TECHNOLOGY BERHAD WHISTLE-BLOWING POLICY

Handling Reported Violations *(continued)*

The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Protection to Whistleblower

A whistleblower will be accorded with the protection of confidentiality of the identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within Genetec, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Anonymous Whistleblower

Any anonymous disclosure will not be entertained. Any director or employee who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate any anonymous disclosure.

Notification

Upon the completion of the whistle-blowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

Review of Policy

The Policy was reviewed and approved by the Board of Directors for adoption with effect from 26 February 2020.