

WHISTLEBLOWING POLICY

Policy Statement

SCICOM is committed to promote and maintain high standards of transparency, integrity, accountability and ethics as well as good Corporate Governance practices in the conduct of its businesses and operations.

In line with these core values, SCICOM has made available an avenue for all employees and members of the public to disclose any improper conduct or malpractice committed or about to be committed to/within SCICOM Group at the earliest opportunity and to provide protection to persons making such disclosure.

Scope of the Policy

The scope of whistleblowing under this Policy includes:

- Incidents of fraud, corruption or bribery;
- Money laundering;
- Abuse of power;
- Conflict of interest;
- Theft or embezzlement;
- Misuse of Company's property or information;
- Breach of applicable laws and regulations;
- Breach of SCICOM's policies, procedures and other codes of conduct;
- Situations which pose a danger to health, safety or any individual or significant danger to the environment;
- Any other wrongdoing the nature of which is subject to SCICOM's absolute discretion.

This Policy does not apply to employment issues which are to be dealt with in accordance with SCICOM's Employee Grievance Procedure.

Whistleblowing Procedure

All disclosures are to be made in accordance with the SCICOM Whistleblowing Procedure as provided under this Policy.

Anonymity of Whistleblower

A Whistleblower is encouraged to identify himself/herself and provide contact information in his/her disclosure. Anonymous disclosures may impede an investigation and prevent SCICOM from providing the Whistleblower with the necessary protection as the Company will not know who you are.

Anonymity of Whistleblower (continued)

Irrespective of this, anonymity will be maintained as permitted by law or the Whistleblower indicates that he/she no longer wishes to remain anonymous.

Protection to Whistleblower

A Whistleblower will be accorded the protection of confidentiality, to the extent reasonably practicable and as permitted by law. In addition, a Whistleblower who is a SCICOM employee will be protected against any adverse or detrimental actions as a result of making a disclosure under this Policy. Such protection is accorded even if the investigation later reveals that the Whistleblower was mistaken as to the facts, the rules or procedures involved.

Withdrawal of Disclosure Made

A Whistleblower may request the withdrawal of his/her disclosure. Such request shall be in writing in accordance with the SCICOM Whistleblowing Procedure.

SCICOM reserves the right to proceed with investigation of a disclosure even if it is subsequently withdrawn by the Whistleblower.

Investigation and Reporting

All disclosures will be investigated promptly by a person/party as directed by SCICOM's Audit and Risk Management Committee ('ARMC'). The ARMC has the authority to:

- Determine the legitimacy of a disclosure received;
- Direct further action;
- Ensure all reasonable steps have been taken for a fair and unbiased investigation regarding a disclosure; and
- Decide on the necessary action to be taken based on recommendation outlined in the investigation report.

Notification

The Whistleblower will be notified of the outcome of his/her disclosure.

This Policy may be amended from time to time.

WHISTLEBLOWING PROCEDURE

Any SCICOM employee or member of the public who has knowledge or is aware of any improper conduct committed or about to be committed to/within the SCICOM Group is encouraged to make disclosure using the procedures outlined below.

Reporting Channel

Disclosure can be made in strict confidential manner to either of the following Independent Directors of SCICOM:

By Email:

- nicholas.lough@scicom.com.my; or
- karen.goonting@scicom.com.my

Scope of Disclosure

Whistleblowing may be made in respect of any of the following:

- Incidents of fraud, corruption or bribery;
- Money laundering;
- Abuse of power;
- Conflict of interest;
- Theft or embezzlement;
- Misuse of Company's property or information;
- Breach of laws and regulations;
- Breach of SCICOM's policies, procedures and other codes of conduct;
- Situations which pose a danger to health, safety or any individual or significant danger to the environment;
- Any other wrongdoing the nature of which is subject to SCICOM's discretion.

The disclosure must be a genuine concern made in good faith.

If the investigation later reveals that the disclosure was not made in good faith, appropriate action may be taken against the Whistleblower.

Protection of Whistleblower

A Whistleblower will be accorded protection under the Policy provided the disclosure was made in good faith.

Whistleblower Identity Disclosure

The Whistleblower is encouraged to identify himself/herself and provide contact information in his/her disclosure. Anonymous disclosures may impede an investigation or prevent SCICOM from providing the Whistleblower with the necessary protection under this Policy.

The following information must be provided if a Whistleblower wishes to disclose his/her identity:

- Full Name
- NRIC / Passport No.
- Contact No. (Mobile / Home / Office)

Content of the Disclosure

To assist in the effectiveness of investigation, all disclosures should contain the following information:

- Incident Date, Time and Location
- Details of the improper conduct:
 - Name of Alleged Person
 - Description of the Alleged Incident
- Other relevant information
- Any supporting evidence (if available)

Withdrawal of Disclosure

A Whistleblower may request withdrawal of his/her disclosure. Such request must be in writing to the established channel and reason(s) for withdrawal should be provided.

Investigation and Reporting

All disclosures will be investigated promptly and as directed by SCICOM's Audit and Risk Management Committee ('ARMC').

Notification of the Outcome of the Disclosure

The Whistleblower will be notified of the outcome of his/her disclosure.

This Procedure may be amended from time to time.