

Whistleblowing Policy & Procedures

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Purpose

The purpose of this policy is to provide an avenue to SCICOM director, employees, other stakeholders and members of the public to raise concerns regarding any improper conduct or malpractice committed or about to be committed to/within SCICOM Group at the earliest opportunity without being subject to victimization, harassment or discriminatory treatment, and to have such concerns properly investigated timely.

Scope

This policy and procedures applies to Scicom (MSC) Berhad and its subsidiaries.

Definitions

Terms	Descriptions
AC	Audit Committee of the Board
Board	Board of Directors of Scicom (MSC) Berhad
Bribery	The offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of duty of care / trust.
Corruption	An act of unlawful or improper behaviour that seeks to gain an advantage through illegitimate means.
Fraud	False representation of facts, whether by intentionally withholding important information or providing false statements to another party for the specific purpose of gaining something that may not have been provided without the deception.
Whistleblower	A person who provides information which he/she reasonably believes discloses a dishonest, wrongful or illegal activity involving SCICOM and its employees.

1. 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 directors, 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.

1.1 Scope

The scope of whistleblowing under this Policy and Procedures 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 and Procedures does not apply to employment issues which are to be dealt with in accordance with SCICOM's employee grievance procedures outlined in SCKL/HRD/PL/007 – Grievance Procedure.

1.2 Whistleblowing Procedure

Any disclosure made by a Whistleblower shall be guided by the following principles:

Reporting Channel:

Disclosure can be made in strict confidential manner to report@scicom.com.my, will automatically be routed to Scicom's email address of the designated Independent Directors.

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)

Acting in Good Faith

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.

Acknowledgement of Receipt

Upon receipt, the Independent Directors will acknowledge receipts.

1.3 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.

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

1.4 Protection of 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.

1.5 Withdrawal of Closure Made

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

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

1.6 Investigation and Reporting

Upon receipt of a disclosure, the AC will review, evaluate and ascertain the legitimacy of the disclosure.

The AC 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.

In the event the disclosure is not legitimate, the evaluation conclusion shall be communicated in writing to the Whistleblower and the process end here.

In the event that the disclosure is legitimate, proceed to identify and appoint suitable Investigation Team to commence investigation on the disclosure received within a stipulated timeline.

At the discretion of the AC, the Investigation Team may comprise of:

Internal resources

- Human Resource Department
- Finance Department
- Operations
- Information and Communications Technology Department

- Risk and Compliance Department
- Any Scicom employees as deemed appropriate

External resources

- External Legal Counsel
- Outsourced Internal Auditors
- External Auditors
- Forensic Auditors
- Consulting Firms

1.7 Notification

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

2. Policy and Procedure Communication

This Policy and Procedure shall be published on SCICOM's website.

3. Review of the Policy

This Policy and Procedure shall be reviewed at least annually by the Board to ensure that it continues to remain relevant and appropriate.