

SANICHI TECHNOLOGY BERHAD

WHISTLE BLOWING POLICY

1. INTRODUCTION

Sanichi Technology Berhad (“STB” or “Company”) and its subsidiaries (“the Group”) are committed to the highest standard of corporate governance and business integrity.

In recognizing the abovementioned values, the Group provides avenue for all employees of the Group and members of the public to raise concerns or disclose any improper conduct within the Group and to take appropriate action to resolve them effectively.

2. OBJECTIVE

The intended objectives of this policy are:

- i. To encourage and develop a culture of openness, accountability and integrity.
- ii. To provide avenues for employees to raise genuine concerns or allegation through the appropriate channels upon discovery of possible misconduct.
- iii. To enable Management to be informed at an early stage about acts of misconduct.
- iv. To ensure the protection to individual who reports the concern or allegation in good faith in accordance with the procedures.

3. SCOPE OF THE POLICY

This Policy applies to the Group.

All Directors and employees of the Group working at all levels and grades, shareholders and any third parties associated with the Group, which may include but not limited to customers, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials are encouraged to report or disclose through established channels, concerns about any violations of the Code of Ethics and Conduct of the Group, including, but not limited to the following:-

- (i) Fraud or Dishonesty;
- (ii) Breaches of Policies, Procedures and applicable laws and regulations;
- (iii) Bribery or Corruption;
- (iv) Abuse of Power;
- (v) Conflict of Interest;
- (vi) Insider Trading;
- (vii) Criminal breach of trust;
- (viii) Sexual Harassment;
- (ix) Misuse of confidential information; and/or
- (x) Or other acts of wrong doing.

4. ACTING IN GOOD FAITH

The Group expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it, are sustainably true and not acting for personal gain. Any anonymous whistle blower will not be entertained. However, the Group reserves its right to investigate into any anonymous disclosure. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

5. CONFIDENTIALITY

The identity of whistle blower will be kept confidential. Consent of whistle blower will be sought should there be a need to disclose identity for investigation purposes.

6. PROTECTION

The Group assures the whistle blower who raises issues of concern that he/she will be protected from any adverse impact on their employment or relationship with the Group as a result of his/her reporting, provided the report is made in good faith and without malice. Any party that retaliates against whistle blower who has reported allegations in good faith may be subject to appropriate action, up to and including legal action, where applicable.

7. REVOCATION OF POLICY

The protection stated in above shall be revoked by the Group if:

- i. The whistle blower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud and/or abuse;
- ii. The whistle blower made his/her disclosure without good faith;
- iii. The disclosure was frivolous or vexatious; or
- iv. The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistle blower himself/herself.

8. ACTION

All reports will be investigated promptly by the person receiving the report or disclosure. If required, assistance from other resources within the Group can be sought. Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee of the Company (“AC”) for their deliberation. Decision taken by the AC will be implemented immediately. Where possible, steps will also be implemented to prevent similar situation arising.

9. WHISTLE BLOWING REQUIREMENTS

The reports should be submitted together with the following information:-

- (i) Details of the whistle blower (strongly encouraged, even though whistle blower may choose to remain anonymous)
- (ii) Type of activity/conduct
- (iii) Details of suspected personnel involved
- (iv) Details of incident (including date, time and location of incident)
- (v) Any supporting/documentary evidence

10. REVERTING TO COMPLAINANT

The whistle blower will be informed on the progress and status of the investigation, however the Group reserves the right not to inform the whistle blower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owed to someone else.

11. WHISTLE BLOWING CHANNEL

The established channels for whistle blowing reporting are as follows:

- a. Any concern should be raised with the immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Managing Director and/or Executive Director (“MD/ED”). The channel of reporting to the MD/ED is as follows:

By Mail: **Strictly Confidential**
SANICHI TECHNOLOGY BERHAD
PLO 135, Jalan Cyber 5,
Kawasan Perindustrian Senai Fasa 3,
81400 Senai
Malaysia

Attention: The Managing Director/Executive Director

- b. If for any reason, it is believed that reporting to management is a concern or not possible or appropriate, then the concern should be reported to the Audit Committee Chairman of the Company (“AC Chairman”). The channel of reporting to the AC Chairman is as follows:

By Mail: **Strictly Confidential**
SANICHI TECHNOLOGY BERHAD
PLO 135, Jalan Cyber 5,

Kawasan Perindustrian Senai Fasa 3,
81400 Senai
Malaysia

Attention: Audit Committee Chairman

12. REVIEW OF THE POLICY

This Policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

13. BOARD APPROVAL

This Policy was reviewed and revised by the Board of Directors of the Company on 19 June 2020.