

PTT SYNERGY GROUP BERHAD

WHISTLEBLOWING POLICY

1. Declaration of Board of Directors

The Board of Directors unconditionally declares that it:

- (a) is against any form of improprieties in matters of financial reporting, compliance and other malpractices;
- (b) encourages employees at all levels and stakeholders to raise matters of concern (Whistleblower); and
- (c) will deal with and follow up on such matters with due safeguard for the protection and interests of the Whistleblower.

2. Objective of the Whistleblowing Policy

This policy applies to PTT Synergy Group Berhad and all its subsidiaries.

The purpose of this policy is to:

- (a) provide a mechanism to detect and address unacceptable conduct;
- (b) ensure whistleblower can raise concerns without fear of suffering retribution and safeguard such person's confidentiality; and
- (c) provide a transparent and confidential process for dealing with concerns.

3. Coverage of Whistleblowing Policy

This policy covers the following matters of concern, including but not limited to:

- (a) criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
- (b) unsafe work practices or negligence in carrying out work obligations;
- (c) misappropriation or unauthorised use of the Company's resources;
- (d) discrimination of race, religion and gender;
- (e) involvement in a conflict of interest situations; and
- (f) concealing any of the above.

4. Safeguards of Whistleblowers

The Group is committed to the following safeguards:

- (a) protect and respect the rights of any whistleblower who raises matters of concern under this policy in good faith;
- (b) will not tolerate any reprisals, discrimination, harassment, intimidation or victimisation of anyone raising a genuine concern or that person's colleagues or relatives;
- (c) will take reasonable steps so that any whistleblower making a disclosure will retain their anonymity unless they agree otherwise or unless otherwise required by law; and
- (d) will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are genuinely mistaken.

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It must be clear that for an anonymous report to be investigated, it must contain sufficient evidence to form a reasonable basis for investigation. It must also be appreciated that following a successful investigation, a statement by the person reporting the concern may be requested to enable appropriate action to be taken to address that concern. It must also be clear that the above safeguards are not extended to anyone who maliciously raises a matter they know are totally untrue.

5. Reporting Procedure

Matters of concern may be made orally or in writing as soon as possible. People who raise the concern are to note the following procedures:

(a) Information to be provided are:

- Name of whistleblower
- Contact details
- Details of person(s) involved
- Nature of the concern and the background and history of the concern with relevant dates, time and venue;
- Provide evidence, if any together with the report
- Is the concern previously raised with anyone else before, and if so, with whom; and
- Why does the concern persists.

(b) Channel for receiving concerns:

For employment-related concerns can be reported to: -

➤ Head of Human Resources

Ms. Elaine Yap at email address: elaineyap@ptt.com.my or mail the letter by marking "Private and Confidential" to the following address:

To: Head of Human Resources
c/o: PTT Synergy Group Berhad
2A-1-1(B), Space U8,
No. 6, Persiaran Pasak Bumi,
Taman Bukit Jelutong,
Seksyen U8, 40150 Shah Alam,
Selangor Darul Ehsan

If for any reason, it is inappropriate or impossible to do so, then the concerns can be reported directly to:

➤ Audit Committee Chairman

Dato' Mahamed Bin Hussan at email address: mahamed1312@gmail.com;
or

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- Member of Audit Committee / Independent Director

Member of Audit Committee / Independent Director at email address: sttoh@hotmail.com; or

mail the letter by marking "Private and Confidential" to the following address:

To: Audit Committee Chairman/ Member of Audit Committee /
Independent Director
c/o: PTT Synergy Group Berhad
2A-1-1(B), Space U8,
No. 6, Persiaran Pasak Bumi,
Taman Bukit Jelutong,
Seksyen U8, 40150 Shah Alam,
Selangor Darul Ehsan

All reports received will be forwarded to the Managing Director at Head Office for verification and discussion by Audit Committee to decide on the next appropriate course of action.

Any applicable or important issues/matters with complete basic information will be reported to the Audit Committee.

6. Investigation Process

- (a) Whistleblower who has raised concerns will be informed within fourteen (14) days on:
 - The person appointed to handle the matter;
 - How to make contact with that person;
 - Any further assistance required from the Whistleblower;
 - Whether further investigation will take place and if not, why not; and
 - How the Group proposes to deal with the matter to be investigated.
- (b) The extent of contact between the contact person and the Whistleblower will depend on the nature of the matter raised, the difficulties involved and the clarity of information provided.
- (c) If necessary, the Group will seek further information from the Whistleblower.
- (d) Where any meeting is arranged including off-site if the Whistleblower so wishes, the Whistleblower can be accompanied by a union or professional representative or a friend.
- (e) There should be an attempt to resolve the matter within twenty-eight (28) days of the report of concern.
- (f) Identity of the Whistleblower shall not be disclosed without prior consent. If identity has to be revealed (e.g. in court), the Group will enter into dialogue with the Whistleblower to determine whether and how to proceed.

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(g) At the end of the investigation, a report of the findings will be presented to the Board of Directors who will then determine the action to be taken.

(h) Once the matter has been concluded, a report will be made to the Whistleblower. The report will explain the findings and actions taken as comprehensively as possible but within commercial, legal and confidential constraints.

7. Review of the Whistleblowing Policy

The Board of Directors will monitor compliance with this Policy and review this Policy regularly to ensure that it continues to remain relevant and appropriate.

8. Effective date

This policy is effective on 12 October 2022.