

**Notion VTec Berhad**  
**(Company No. 637546-D)**

**Whistle Blower Policy**

**1. Purpose**

This policy is intended for Notion VTec Berhad (“Notion” or “the Company”) and all subsidiary companies within the Notion Group, hereinafter refer to as the Group.

All employees of the Group play an important part in maintaining the highest level of corporate ethics within the Group, and have a professional responsibility to disclose any known malpractices or wrongdoings (hereon referred to as “Concerns”).

**2. Safeguards**

A person or entity making a protected disclosure is commonly referred to as a “Whistleblower”. Whistleblowers provide initial information related to a reasonable belief that an improper activity has occurred.

Whistleblowers are protected against being dismissed or penalised by the Group, and Notion will consider mitigating circumstances if the Whistleblower himself / herself is involved in the activity that he / she reports.

In order for the Whistleblower to be protected under this policy, the disclosure must at least have details of person(s) involved, nature of allegation, when and where the incident took place as well as supporting evidence, if any.

A Whistleblower’s right to protection from retaliation does not extend to immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

**3. Harassment Or Victimisation**

Harassment or victimisation for reporting concerns under this Policy will not be tolerated.

Complete protection will be given to Whistleblower against any unfair practice not limited to retaliation, threat or intimidation of termination/ suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or including any direct or indirect use of authority to obstruct the Whistleblower’s rights to continue to perform his/her duties including making further disclosure.

**4. Confidentiality**

Every effort will be made to treat the Whistleblower’s identity with appropriate regard for confidentiality. The Group gives the assurance that it will not reveal the identity of the Whistleblower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by law or for purposes of any proceedings by or against the Group. The Group’s assurance of confidentiality can only be completely effective if the Whistleblower likewise maintains confidentiality.

## **5. Anonymous Allegations**

This Policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:-

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

## **6. Procedures**

### **6.1 Process for Disclosure**

#### **I) Impropriety**

This policy covers improprieties or irregularities, suspected fraud or criminal offences, breach of confidentiality and failure to comply with legal or regulatory requirements.

#### **II) Reporting**

Managers, officers and employees in supervisory roles shall report to the reporting person(s) on any allegations of suspected improper activities.

Such disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

- **Chairman of Audit and Risk Management Committee** of Lot 6123, Jalan Haji Salleh, Batu 5½, Jalan Meru, 41050 Klang, Selangor Darul Ehsan or [keithvtec@yahoo.com](mailto:keithvtec@yahoo.com)

Employment-related concerns can be reported to:

- **Head of Human Resources** of Lot 6123, Jalan Haji Salleh, Batu 5½, Jalan Meru, 41050 Klang, Selangor Darul Ehsan or [jerrychoowy@notionventure.com](mailto:jerrychoowy@notionventure.com)

Disclosures can be verbal or in writing and forwarded in a sealed envelope to the abovementioned contact person(s) labelling with a legend such as “To be opened by the Chairman of Audit and Risk Management Committee or Head of Human Resources only”.

#### **III) Handling of a reported allegation**

The action taken by the Group in response to a report of Concern under this policy will depend on the nature of the concern. The Chairman of Audit and Risk Management Committee shall receive information on each report of Concern and follow-up information on actions taken.

### **6.2 Investigator**

The Internal Auditor shall be the named Investigator unless the Chairman of Audit and Risk Management Committee assigns / appoints another

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**(Company No. 637546-D)**  
**Whistle Blower Policy**

Investigator. Investigators must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairman of Audit and Risk Management Committee.

**6.3 Inquiries**

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

If an investigation leads the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group's Code of Ethics or Conduct, the results of the investigation shall be reported to the above-mentioned parties in accordance with the applicable procedures for company conduct and the administration of discipline. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

**7. Policy Matters**

This Policy shall be published at the Company's website and made available to all employees.

**8. Monitoring and Periodic Review of Policy**

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group, and, if necessary, implement changes subject to the approval of the Company's Board of Directors.

This policy will be reviewed periodically and may be amended as it deems appropriate to ensure its relevance and effectiveness.

*This Whistle Blower Policy has been approved and adopted by the Board on 22 August 2019.*