

Objective of this Policy

All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

This Policy is designed to:

- a) promote and maintain high transparency and accountability in the workplace;
- b) promote good corporate governance practices in the workplace;
- c) ensure that employees can raise concerns without fear of reprisals and safeguard such person's confidentiality;
- d) protect a whistleblower from reprisal as consequence of making a disclosure;
- e) provide a transparent and confidential process for dealing with concerns;
- f) protect the long term reputation of the company;
- g) support the company's values; and
- h) maintain a healthy working culture and an efficient company.

This policy not only covers improprieties in matters of financial reporting, but also:

- negligence in carrying out work obligations;
- fraud;
- corruption, bribery or blackmail;
- criminal offences;
- failure to comply with a legal or regulatory obligation;
- miscarriage of justice;
- endangerment of an individual's health and safety; and
- concealment of any, or a combination, of the above.

Principles

The principles underpinning the Policy are as follows:

- internal procedures to facilitate necessary whistleblowing, in a timely and responsible manner, are in place and made known to all employees of the company;
- all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
- the company will not tolerate harassment or victimization of anyone raising a genuine concern;
- the identity and personal information of the whistleblower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law;
- the whistleblower and the alleged wrongdoer will be treated fairly. The whistleblower will be informed of the status of his disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation);
- personal information, including the identity, of the whistleblower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis;
- the company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The company, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue; and
- any form of retaliation against individuals who have reported a wrongdoing or who have facilitated with the investigations is a breach of the principal obligation of all staff members to uphold the highest values and integrity.

Covered concerns

A disclosure relating to, but not limited to, either of the following concerns or wrongdoings by any person in the conduct of the business shall be reported:

- a) corruption, bribery and fraud;
- b) negligence in carrying out work obligations;
- c) criminal offence or any breach of the laws of Malaysia;
- d) acceptance of gifts/ favor beyond the threshold allowed by the company;
- e) misuse and/or misappropriation of the company's funds or assets;
- f) impropriety (including financial and operational, etc.) within the company;
- g) gross mismanagement within the company (including serious potential breach to the interest of society and environment);
- h) breach of code of ethics of the company, including sexual, physical or other abuse of human rights; and
- i) act or omission which jeopardizes the health and safety of the company's employees or the public.

Reporting procedure

If any employee believes reasonably and in good faith that malpractices exist in the workplace, the employee should report this immediately to the line manager. However, if for any reason the employee is reluctant to do so, then the employee should report the concerns to either the:

- The Chairman of the Audit Committee; or
- A member of the Board Committee.

Employees concerned about speaking to another member of staff or who want seek advice how to raise a concern, can speak, in confidence, to an independent third party by calling the whistle-blowing hotline 03-8080 9911. The independent party will provide the employee with counseling advice. These concerns will be reported to the company without revealing the identity of the whistleblower.

If these channels have been followed and if employees still have unresolved concerns or if employees feel the matter is grave in nature that it cannot be discussed with any of the appointed persons above, they should contact The Chairman of the Audit Committee or a member of the Board Committee at report@onedocgroup.com, being the director identified in the company's annual report as one to whom concerns may be conveyed.

Employees who have raised concerns internally will be informed of who is handling the matter, how they can make contact with them and if there is any further assistance required.

Employees' identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can progress further.

Consequences of wrongdoing or wrongful disclosure

If the Person (i.e. the whistleblower) has, or is found to have:

- committed a wrongdoing;
- taken serious risks which would likely cause a wrongdoing to be committed;
- made a disclosure not in accordance with the requirements of this policy (for instance, dishonest, mischievous or malicious complaints); or
- participated or assisted in any process pursuant to this policy otherwise than in good faith.

The corrective actions to be taken against that Person will be determined by the The Chairman of the Audit Committee or, if so delegated by the Board, the senior management, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

Protection

The identity and personal information of the whistleblower will be protected and kept confidential, unless the whistleblower agrees otherwise or unless otherwise required by law.

The whistleblower will be protected from reprisal, including any form of harassment and victimization, as a consequence of his disclosure.

The whistleblower will be protected under the **Whistleblower Protection Act 2010** if he or she makes a disclosure in good faith to an enforcement agency.

If a whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimization, as a consequence of whistle-blowing, he may consult or report to the appointed persons:

The Chairman of the Audit Committee or a member of the Board Committee;
Email: report@onedocgroup.com