

## **WHISTLEBLOWING POLICY**

### **1. Policy Statement**

Hexagon Synergy (M) Sdn. Bhd. (HSSB) strives to conduct its business and operations with integrity, transparency, competence and professionalism while achieving the highest level of responsibility and excellence. To uphold this aspiration, company must detect and deal with improper conduct. Recognising the abovementioned values, HSSB provides avenue for all employees of HSSB and members of the public to disclose any improper conduct within HSSB. Whistleblowers who come forward in good faith with information on actual or potential improper conduct are protected under the Whistleblower Protection Act 2010.

### **2. Objective of the policy**

This policy provides an avenue for all employees and its contractors, consultants, suppliers, interns, customers and members of the public to report their concerns about any illegal, unethical or questionable practices by HSSB's employees in confidence and without the risk of reprisal.

### **3. Scope of the Policy**

This policy is established to provide a clear and secure avenue for employees and members of the public to report any misconduct or criminal offenses through an internal reporting channel. It aims to promote transparency, integrity, and accountability within the organization by encouraging whistleblowing in a safe and confidential manner.

Misconduct or criminal offenses that fall under the scope of this policy include, but are NOT limited to, the following:

- a) Fraud;
- b) Bribery and Corruption;
- c) Criminal offence;
- d) Money laundering, financing of terrorism, tax evasion, financing of proliferation of weapons of mass destruction or violation of sanctions requirements;
- e) Breach of company's Code of Conduct by its officers and employees;
- f) Non-compliance with regulatory requirements or the provisions of the laws administered by company, by any person;

It is advisable for a potential whistleblower to consider whether the alleged improper conduct to be disclosed to HSSB falls within any of the above, prior to making the

report. Potential whistleblowers may wish to seek legal advice from a legal practitioner before making the disclosure to HSSB.

#### **4. Protections to Whistleblower**

HSSB is committed to provide the whistleblower protections as outlined under the Whistleblower Protection Act 2010. The following protections will be accorded to a whistleblower who makes a disclosure of improper conduct to HSSB in good faith:

- a) confidentiality of information;
- b) immunity from civil and criminal liability for the disclosure made; and
- c) protection from detrimental action.

#### **5. Revocation of Whistleblower Protection**

The whistleblower protection does not extend to the following disclosures and will be revoked by HSSB pursuant to section 11 of the Whistleblower Protection Act 2010:

- a) where the disclosures of improper conduct which are:
  - (i) frivolous or vexatious;
  - (ii) principally questioning the merits of government policy, including policy of a public body;
  - (iii) known to the whistleblower to be false or untrue; or
  - (iv) made solely or substantially to avoid dismissal or other disciplinary action;
- b) where the whistleblower has participated in the improper conduct disclosed; or
- c) where the whistleblower commits an offence under the Whistleblower Protection Act 2010.

Any person who makes a disclosure of improper conduct to HSSB, knowing or believing that any material statements in the disclosure is false or untrue commits a criminal offence under the Whistleblower Protection Act 2010.

#### **6. Procedure in Making a Disclosure**

Any disclosure of improper conduct that concerns HSSB must be submitted through [whistleblower@hexagonsgroup.com](mailto:whistleblower@hexagonsgroup.com) or made to any of the relevant Designated Person through the specific communication channels.

Whistleblowers are advised to make their disclosures in writing and to provide sufficient details which include the following:

- (i) the type or description of improper conduct;
- (ii) the name of individuals who have committed or are involved in the improper conduct; and

- (iii) the 'how', 'what', and 'where' in relation to the improper conduct including supporting documents or evidence, if any.

## **7. Feedback to Whistleblower**

Whistleblowers are encouraged to provide their identities or contact details to facilitate HSSB to clarify or obtain further information for purposes of further investigation into the improper conduct. Any person who chooses to remain anonymous is advised that no whistleblower protection will be accorded and HSSB's ability to investigate the alleged improper conduct is limited to the extent of the contents of the report received by HSSB.

Whistleblowers will be informed by the Designated Person of the outcome of the investigation and action taken, if any, by the appropriate disciplinary authority or the other appropriate authority, the employer or the other appropriate person or the Public Prosecutor, as the case may be.

HSSB reserves the right to amend this policy from time to time.