

COMPUGATES	WHISTLE BLOWING POLICY	Policy/Guideline No: GP1003/01
		Issued By: ED
Title: WHISTLE BLOWING		Approved By: CEO
Effective Date: FEB 2018	Supersedes No: -	Page 1 of 1

Compugates is committed to promote and maintain high standard of integrity, openness and accountability in the conduct of its businesses and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner.

Objective

Compugates provides avenue for all employees and members of the public to disclose any improper conduct in accordance with the procedures as provided for under this policy to provide protection for employees and members of the public who report such allegation. Also to provide protection for the whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such person's confidentiality. Only genuine concerns should be reported. Report should be made in good faith with a reasonable belief that the information and any allegation in it are substantially true with supporting documentary proof and the report is not made for personal gain.

Scope

This policy is designed to facilitate employees and members of the public to disclose any improper conduct through internal channel. Such misconduct or offences include the following :-

- i) Conduct or activity which breaches any law or regulatory obligation;
- ii) Breach of the Company's polices, practices, procedures or other rules of conduct;
- iii) Improprieties in matter of financial reporting;
- iv) The use of deception to obtain an unjust of illegal financial advantage, either for the Company or personally
- v) Forgery, falsify, fictitious reporting of any document or account belonging to the company
- vi) Abuse of power; miscarriage of justice;
- vii) Serious non-professional or non-ethical behaviour
- viii) Conflict of interest;
- ix) Theft or embezzlement;

The list is not exhaustive and includes any act or omissions, which if proven, is deemed as an act of improper conduct or wrongdoing constituting a disciplinary offence under Compugates Code of Conduct, any employment agreement or service contract; or any criminal offence under relevant legislation in force.

Communication Channel

Disclosure can be submitted via whistleblower@compugates.com for which the designated personnel will have access.

Whistleblower must disclose name, NRIC number and contact details. The disclosure must have details of person(s) involved, nature of allegation, when and where the incident took place as well as supporting evidence, if any.

Compugates reserves the rights to direct the disclosure to other relevant grievances channel if the disclosure does not fall under this policy.

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

Action

All reports will be investigated promptly by the person receiving the report. If required and necessary, the matter could be referred to an external agency and this may result in an extension of the investigation process. Upon completion of investigation, appropriate course of action will be recommended to the Audit Committee for deliberation. Decision taken by Audit Committee will be implemented immediately. Where possible, steps will also be implemented to prevent similar situation from arising.

Further Action

If the whistleblower is dissatisfied with the outcome of the investigation, the person can escalate the report to the Chairman of Audit Committee or raise it with relevant governmental, regulatory authorities and enforcement agencies in Malaysia under Protection Act 2010 (“Relevant Authority”)

Protection to Whistleblower

Compugates undertakes to protect the personal information of the whistleblower under the provisions of the Personal Data Protection Act 2010.

Where the whistleblower is an employee of the Company and the disclosure is made in good faith, the employee will be protected from harassment, discrimination or victimization. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts.

It is to be noted that person who has not acted in good faith shall not be entitled to any protection under this Policy.

Any anonymous disclosure will not be entertained.

However, the Company reserves its right to investigate into any anonymous disclosure.