

Notion VTec Berhad
(Company No. 637546-D)

WHISTLEBLOWING POLICY AND PROCEDURE

1. Objective & Scope

Notion VTec Berhad (“the Company”) and its subsidiaries (collectively known as “the Group”) are committed to conduct the Group’s business with the highest level of corporate ethics and embedded culture of transparency and accountability in day-to-day business operations.

This policy provides an avenue for all employees of the Group and business associates to report any genuine concern in accordance with the procedures as provided for under this policy and to provide protection for the whistleblower(s) who report such allegations.

It is designed to facilitate employees and business associates to report any genuine concern or malpractices (hereinafter referred to as “Concerns”) through the Company’s provided channel. Such concerns or criminal offences include (but not limited to) the following:

- i. Actual / suspected fraud;
- ii. Any form of corruption activities;
- iii. Abuse of power;
- iv. Conflict of interest;
- v. Theft or embezzlement;
- vi. Misuse of Company’s property; and
- vii. Non-compliance with Policies & Procedures / laws and regulations.

2. Confidentiality and Anonymity

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 when 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.

3. Protection

The Whistleblowing Policy and Procedure offers protection within limits of the law and to the extent reasonably practicable to whistleblower(s) who submit the reports internally in good faith, even if the allegations prove to be unfounded or mistaken. In addition, a whistleblower will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the organisation, to the extent reasonably practicable, provided that the disclosure is made in good faith.

4. Reporting in Good Faith

Reporting in good faith includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

5. Anonymous Allegations

Although the Company is not expected to address any anonymous allegations, the Company may, however, consider conducting an inquiry of an anonymous allegation after having considered the following:

- i. the seriousness of the concern;
- ii. the credibility of the concern; and
- iii. the likelihood of confirming the concern from credible 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

Whistleblower may refer to *Whistleblower Report Form* appended as a reference for providable information, to report any Concerns to the following channels:

- a) Email to designated personnel as stated below:

No.	Concerns	Designation	Email
1	Financial Reporting, Unethical or Illegal conduct	Chairman of Audit and Risk Management Committee	keithvtec@yahoo.com
2	Employment-related	Head of Human Resources	jerrychoowy@notionventure.com

- b) Letters/documents/reports (in sealed envelope with labelled “STRICTLY PRIVATE AND CONFIDENTIAL TO BE OPENED BY THE ADDRESSEE ONLY” to be addressed to:

THE AUDIT AND RISK MANAGEMENT COMMITTEE
NOTION VTEC BERHAD

Lot 6123, Jalan Haji Salleh,
Batu 5½, Jalan Meru,
41050 Klang, Selangor D.E.

If the whistleblower, either from an internal or external source makes a report through a third party, i.e., Senior Management who may be the Managing Director, Executive Director, Operations Director, Chief Financial Officer, General Manager or any other employee, then it is the responsibility of the third party to escalate the report to the right channel as mentioned in (a) and (b) above.

iii. Handling of a reported allegation

All reports of misconduct, findings of investigations and monitoring and corrective actions shall be centralised and logged in a log administered and monitored by the Company’s Board of Directors. The Board shall be informed of any new reports of misconduct and may request to review the log at any time.

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

6.2 Investigator

The Internal Auditor shall be the named Investigator unless the Chairman of Audit and Risk Management Committee assigns / appoints another 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 actions 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 Conduct and Code of Ethics, the results of the investigation shall be reported to the above-mentioned parties accordingly for the next course of action by the relevant party. 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 for all internal and external stakeholders.

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.

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NOTION VTEC BERHAD WHISTLEBLOWER REPORT FORM

Please provide the following details for any suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the Company. Please note that you may be called upon to assist in the investigation, if required.

Note: Please follow the guidelines as laid out in the Whistleblowing Policy and Procedure.

Reporter's Contact Information		
Name		
I/C No. / Passport No. / Staff No.		
Correspondence Address		
Telephone No.	Home	
	Office	
	Mobile	
E-mail Address		
Designation / Occupation		
Division/Section/Unit/Branch		
Preferred method of communication	<input type="checkbox"/> Mail <input type="checkbox"/> E-mail <input type="checkbox"/> Telephone / SMS	

Suspect's Information		
Individual 1		
Name		
Designation		
Division/Section/Unit/Branch		
Contact Number		Email Address
How do you know this employee?		
Individual 2		
Name		
Designation		
Division/Section/Unit/Branch		
Contact Number		Email Address
How do you know this employee?		
Individual 3		
Name		
Designation		
Division/Section/Unit/Branch		
Contact Number		Email Address
How do you know this employee?		

Details of the misconduct		
COMPLAINT: Briefly describe the misconduct / improper activity and how you know about it. Specify what, who, when, where and how. If there is more than one allegation, number each allegation and use as many pages as necessary.		
What misconduct / improper activity occurred?		
Who committed the misconduct / improper activity?		
When the misconduct / improper activity occurs? And since when did you notice it?		
Where did the misconduct / improper activity happen?		
Is there any evidence that you could provide to us?		
Do you have any other details or information which would assist us in the investigation?		
If money is involved, can you estimate the amount of money involved?	Yes	No
If YES, please indicate the estimated amount of money involved (cross X where applicable):		
Less than RM500	<input type="checkbox"/>	
RM501 to RM10,000	<input type="checkbox"/>	
RM10,001 to RM50,000	<input type="checkbox"/>	
More than RM50,001	<input type="checkbox"/>	
Have you lodged a complaint on this matter to another person / department / authority before?	Yes	No
If YES, please indicate the person / department / authority that the report was lodged (cross X where applicable and attach copy of the report made):		
Police	<input type="checkbox"/>	
Malaysian Anti-Corruption Commission	<input type="checkbox"/>	
Others, please indicate:	<input type="checkbox"/>	
Date when the Report was made		
Status of report made		

Declaration

I declare that all information provided in this Form is true, correct and complete to the best of my knowledge, information and belief.

I hereby agree that the information provided herein to be used and processed for investigation purposes and further agree that the information provided herein may be forwarded to a department / authority / enforcement agency for purposes of investigation.

Signature

Name

Date

For office use only

Record No.

Receipt Information

Person receiving this report:

Date Received:

Acknowledgement of receipt sent on:

Investigation required (YES / NO)? (If No please state the reason)

Investigation Done By:

Investigation Result:

Action Taken / Conclusion:

Reported to the Board on:

Signed off by: