

# LOBETRONICS TECHNOLOGY BERHAD

Registration No. 199601037932 (410285-W)

(Incorporated in Malaysia)

## WHISTLE BLOWING POLICY AND PROCEDURE

### 1. Purpose

(a) Globetronics Technology Berhad and its subsidiaries ('GTB Group') is committed to achieving and maintaining high standards with regards to behavior at work as set out in GTB's 'Principles of Business Conduct'.

(b) GTB Group places high value on the level of trust and integrity expected of its employees within its Group of Companies.

(c) In order to achieve the standards set in the GTB Group's Principles of Business Conduct and zero tolerance of corruption stated in GTB's Anti-Corruption and Bribery Policy, all employees and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith or on basis of reasonable belief when reporting such concerns.

(d) GTB Group views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to disciplinary actions.

### 2. Scope

(a) This Whistle blowing policy is applicable to GTB Group. All employees (whether permanent, contract, part-time or casual), directors, shareholders, vendors, customers and other stakeholders are encouraged to disclose any wrongdoing that may adversely impact the Company.

### 3. Whistle Blowing

(a) Whistle blowing is a specific mean by which an employee or stakeholder can report or disclose through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements that is taking place / has taken place / may take place in the future.

Below are some examples of reportable malpractice, misconduct or conflict of interest. The list is not exhaustive.

- Bribery or corruption
- Dishonest or fraudulent act
- Breaching of legal obligations
- Forgery or alteration of any document or account belonging to the company
- Misappropriation or theft of funds, supplies or other assets
- Inventory or asset theft
- Falsifying of company's records or claims for personal interest
- Acceptance of fictitious quotations from suppliers, vendors or contractors in favouring for a particular entity

(b) Whistle blower is the person who reports or make disclosure when he/she has reasonable grounds to believe a misconduct has taken place/going to take place /may take place.

### 4. Policy

#### 4.1 Disclosure

(a) GTB Group encourages the employees / other stakeholders to make any disclosures openly and honestly and that concerns / complaints raised will be treated fairly and properly.

(b) All disclosures made under this policy will be dealt with in a confidential manner. The identity of the whistle blower raising a concern shall be kept confidential unless otherwise required by law or for the purpose of any proceedings by or against the Group.

(c) GTB Group encourages the whistle blower to disclose his/her identity to enable him/her to be accorded with the necessary protection and to facilitate investigation. Nevertheless, the whistle blower may choose to remain anonymous, although in certain circumstances, it may limit the conduct of a comprehensive investigation due to insufficient information. Irrespective of this, anonymity will be maintained as long as it's permitted by law or unless the person making the report indicates that he no longer wishes to remain anonymous.

(d) Only genuine concerns should be reported under whistle blowing procedures. This report should be made in good faith or on basis of reasonable belief that the information and any allegation in it are substantially true.

(e) Whistle blower is not expected to have substantial evidence of proof beyond reasonable doubt or be able to identify a particular person to which the report relates. If the whistle blower knows as a matter of fact that there are reasonable grounds of suspicion that a misconduct is going to take place, is taking place or has taken place, the whistle blower may come forward with any information or document(s) that they have.

(f) Whistle blower is responsible for making the disclosure in good faith, free from malicious intent, and is not for personal gains or with a vested interest. Reports made that are frivolous, not true, misleading or made mala fide or with malicious intent may result in disciplinary or other action.

#### 4.2 Protection

(a) If any one refuse to accept or offer a bribe or report a concern relating to potential act(s) of bribery or corruption, GTB Group understands that he/she may feel worried about potential repercussions. GTB Group will support anyone who raises concern in good faith under this policy, even if investigation finds that they were mistaken.

(b) GTB Group will ensure that he or she is protected from any reprisal as a result of refusing to accept or offer a bribe or other corrupt activities or because he/she reported a concern relating to potential act(s) of bribery or corruption. Any reprisal, including, but not limited to, any act of discrimination, harassment, suspension, constructive or actual dismissal, demotion, vengeance or any other occupational detriment, threatened or taken against a whistle blower will not be tolerated and would be treated as a misconduct, and may result in disciplinary action if any of such acts was committed.

(c) Suppliers/ Vendors of GTB Group and other stakeholders who become a whistle blower will also be protected by GTB Group as to his / her / its identity subject to reporting in good faith as stated in this policy.

(d) This protection is not extended to those who maliciously made a report that they know is untrue or is not in accordance with this Policy.

## 5. Procedure

(a) Reports or disclosure under this policy can be made through e-mail or mail (using the below form as per Appendix A).

(b) It can be addressed to the immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Executive Chairman.

Channel of reporting to Executive Chairman is:

Name : Ng Kok Yu  
e-mail : [kok\\_yu@globetronics.com.my](mailto:kok_yu@globetronics.com.my)  
Telephone : +604 8194 103  
  
**Mark Strictly Confidential**  
Globetronics Technology Berhad  
Plot 2, Phase 4,  
Mail : Free Industrial Zone,  
11900 Bayan Lepas,  
Penang.  
Attention : Executive Chairman

(c) In the case where reporting to management is a concern, then the report should be made to the Chairman of Audit and Risk Management Committee (“ARMC”).

Channel of reporting to the Chairman of ARMC is:

Name : Ms Ong Huey Min  
e-mail : [lindyong@ynwa.com.my](mailto:lindyong@ynwa.com.my)  
  
**Mark Strictly Confidential**  
Globetronics Technology Berhad  
Plot 2, Phase 4,  
Mail : Free Industrial Zone,  
11900 Bayan Lepas,  
Penang.  
Attention : Chairman – Audit and Risk Management Committee

(d) The whistle blower should be able to provide in the disclosure in writing, information regarding the type of activity or conduct, identity of the person(s) suspected as being involved/going to be involved, when it occurred/going to occur and who was/will be affected.

(e) The whistle blower is encouraged to identify himself / herself and provide contact information in his/her report. This will facilitate the investigator to obtain further information, if required and communicate on results of investigation to the whistle blower.

## 6. Action

(a) All reports will be investigated promptly by the person receiving the report. If required, he can obtain assistance from other resources within the Group (e.g. Internal Auditor, Human Resource Department, Finance Department etc.). The progress of investigation will be reported to the ARMC no later than at the next scheduled meeting.

(b) Upon completion of investigation, appropriate course of action will be recommended to the ARMC for their deliberation. Decision taken by the ARMC will be implemented immediately.

(c) Where possible, steps will also be implemented to prevent similar situation arising.

## 7. Further action

(a) If for any reason, the person making the report is not satisfied with the way his report had been dealt with, he can escalate his report to the Chairman of ARMC. Channel of reporting to the Chairman of ARMC is:

Name : Ms Ong Huey Min  
e-mail : [lindyong@ynwa.com.my](mailto:lindyong@ynwa.com.my)  
*Mark Strictly Confidential*  
Globetronics Technology Berhad  
Plot 2, Phase 4,  
Mail : Free Industrial Zone,  
11900 Bayan Lepas,  
Penang.  
Attention : Chairman – Audit and Risk Management Committee

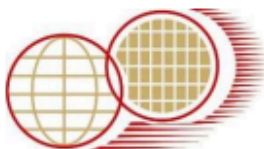
(b) Chairman of ARMC will deliberate the report with his ARMC members and decide on the appropriate course of action.

## 8. Revision Of Policy

The executive management shall review and update the policy periodically taking into consideration the needs of the Group as well as any new requirements in rules and regulations.

Any revision or amendment to the policy, as proposed by the executive management shall be presented to the Board for its approval.

Reviewed and Approved on 27 April 2021



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**Whistle blowing Form**

<b>Date of Report:</b>	
<b>To :</b>	
<b>Incident Date and Time:</b>	<b>Date:</b> <b>Time:</b>
<b>Location:</b>	
<b>Name of Alleged Person/Dept:</b>	
<b>Employee/Badge No:</b>	
<b>Detailed description of the alleged Incident ( Please include any attachment if needed)</b>	
<b>Any witness : Yes/No</b>	
<b>If yes, please state the name of the witness (es):</b>	
<b>Reported By :</b>	
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<b>( Signature)</b>	
<b>Name</b>	<b>:</b>
<b>Employee No (if any)</b>	<b>:</b>
<b>Dept/Company</b>	<b>:</b>
<b>Contact No</b>	<b>:</b>