



## **1. INTRODUCTION**

This Whistleblowing Policy (“Policy”) applies to the OneTech Solutions Holdings Berhad and its subsidiary companies (“Group” or “OneTech Group”).

## **2. PURPOSE**

- 2.1 The Group encourages its employees to report any suspected misconduct or malpractice within OneTech Group via the channel provided in this Policy.

## **3. SCOPE**

- 3.1 This Policy applies to employees at all levels and divisions of the entire Group.
- 3.2 This Policy also applies to customers, suppliers, sub-contractors, advisors and such person/party who has dealing with the Group (“Relevant Third Parties”).

## **4. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

- 4.1 Employees and Relevant Third Parties who whistleblow in good faith are assured of protection against unfair dismissal, victimisation or unwarranted disciplinary actions, even if the allegations made in the complaints turn out to be untrue.
- 4.2 Person(s) who victimise or retaliate against the whistleblower will be subject to disciplinary actions.
- 4.3 While the Group values and appreciates anyone who whistleblows in good faith, reports made maliciously, with ulterior motives, without reasonable grounds, and/or based on apparently inaccurate or unreliable information may face disciplinary actions including dismissal.
- 4.4 While the Group could not guarantee that the investigations will yield an outcome desired by the whistleblower, it will endeavor to respond to the reports fairly and properly.

## **5. ROLES AND RESPONSIBILITIES**

- 5.1 The Group’s Board of Directors has overall responsibility for the Policy. It monitors and reviews any operations with regards to the Policy and any recommendations for actions to address the outcomes of investigations.
- 5.2 The day-to-day responsibilities to implement the Policy and monitor its effectiveness shall fall on the member(s) of which shall be formally appointed by the Board of Directors.
- 5.3 The Group shall ensure that all employees and Relevant Third Parties feel able to raise concerns without fear of reprisals.



- 5.4 All employees and the Relevant Third Parties shall endeavour to disclose any suspected misconduct or malpractice of which they become aware.
- 5.5 Any inquiries with regards to this Policy shall be made to the PIC via the contact information provided under “Reporting” below.

## **6. MALPRACTICES AND MISCONDUCTS**

- 6.1 Activities that constitute misconduct or malpractice that form grounds for whistleblowing include, but are not limited to, the following: -
- a) A criminal offence;
  - b) A failure to comply with any legal obligations;
  - c) A miscarriage of justice;
  - d) Financial impropriety including kickbacks, bribery, fraud or suspected fraud or deficiencies in internal control or deliberate error in preparations of Financial Statements or misrepresentation of financial reports;
  - e) An action which endangers the health and safety of any individual;
  - f) Improper conduct or unethical behavior;
  - g) Internal control weaknesses or loopholes;
  - h) Fraudulent activities (e.g. manipulation of data/ records);
  - i) Unfair/ improper selection of the Relevant Third Parties;
  - j) Wastage/ misappropriation of funds/ assets; and
  - k) Deliberate concealment of information concerning any of the matters listed above.

## **7. REPORTING**

- 7.1 Whistleblowers should send all concerns and information directly to Person In Charge (“PIC”) whose contact details are as follows: [yonglc@lerpsolutions.com](mailto:yonglc@lerpsolutions.com).
- 7.2 Whistleblow that pose very high risks to the Group (eg. involving high-level personnels, highly sensitive issues, etc.) will be referred immediately to the Independent Director at [aikcheong@hotmail.com](mailto:aikcheong@hotmail.com).
- 7.3 Reports should preferably be clearly handwritten or printed in English, be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.



- 7.4 The Group respects that a whistleblower may prefer to file his/her report anonymously. Unfortunately, anonymous reports may cause inability by the PIC to thoroughly assess them simply because the PIC had no leads for further information, especially if the reports failed to include such crucial information. For this reason, the Group strongly encourages whistleblowers to identify themselves and provide their contact information in their whistleblowing reports.
- 7.5 Where whistleblower's identity and the identity of any persons are contained in the whistleblowing report, the PIC shall endeavour to keep them confidential until such circumstances occur, likely due to the nature of investigation, that it becomes necessary to disclose the identities of the whistleblower and any persons mentioned in the report.

## **8. INVESTIGATION PROCEDURES**

- 8.1 The PIC will send an acknowledgement receipt to the whistleblower within three working days, if the whistleblower has provided his/her contact details.
- 8.2 The PIC will proceed with an investigation method deemed suitable while keeping the Independent Director consistently informed of the case(s) and their status.
- 8.3 If investigation by the PIC yields that a criminal offence had taken place, the PIC will consult the Independent Director to decide if the matters should be referred to the law enforcers.
- 8.4 The Group may refer the case to law enforcers without prior notice to or consultation with the whistleblower. Once the case has been referred to the law enforcer, the Group will not be able to take further action on the matter, other than providing due assistance to the law enforcers where required for the case.
- 8.5 Upon completion of internal investigation by the PIC, an investigation report will be submitted to Board of Directors for their review. If the investigation concludes that an improper or unethical act has been committed, the report shall include recommendation for suitable corrective actions.
- 8.6 Any disciplinary or corrective action initiated as a result of the findings of an investigation pursuant to this Policy shall adhere to the Group's prevailing disciplinary procedures.
- 8.7 In the event an individual has a conflict of interest in dealing with the complaint, he/she shall abstain from participating in the entire process.
- 8.8 The whistleblower will be informed of the outcome of the investigation, if appropriate. Due to legal constraints, the Group will not be able to provide the details of actions taken or a copy of the investigation report to the whistleblower.

This Whistleblowing Policy was last updated on 1 December 2021