

Whistleblowing Policy

OSKVI-IA-POL-001-3

15 November 2023

OSK VENTURES
INTERNATIONAL BERHAD

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 2 of 12

Contents

Revision History Log	3
Glossary	4
A. POLICIES	5
A1. Overview.....	5
1. Introduction	5
2. Objectives	5
3. Coverage.....	5
4. Limitations.....	6
5. Reference.....	6
6. Intended Audience	6
7. Review and Notice	6
A2. Whistleblowing	7
1. Guiding Principles.....	7
2. Whistleblowing Procedure.....	8
3. Reporting Channels	9
4. Protection Afforded	10
5. Confidentiality.....	11
6. Anonymous Whistleblower	11
7. Safekeeping of Records	11
8. Rewards.....	12
9. Duties and Functions of AC in Relation to Whistleblowing	12

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 3 of 12

Revision History Log

Ver. No	Section	Section Name	Page	Details of Amendments	Effective Date	e-Circular No.
1	All	All	All	Document published	4-Nov-2014	N/A
2	All	All	All	Document revised - refer to the Summary of Change	22-Feb-2018	OSKVI/IA/CI R/002
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OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 4 of 12

Glossary

Term	Description
"AC"	Audit Committee of OSKVI
"act in good faith"	Refers to acting under honest belief without malicious intentions and in the best interest of OSKVI Group
"BOD"	Board of Directors of OSKVI
"employees"	Includes permanent, temporary and contract employees of OSKVI Group
"improper conduct"	Refers to any conduct which if proven, constitutes a disciplinary offence or a criminal offence
"OSKVI"	OSK Ventures International Berhad
"OSKVI Group"	Refers to OSK Ventures International Berhad and its subsidiaries, collectively
"Management"	Refers to the Executive Committee members of OSKVI Group or above
"WB Coordinator"	Refers to a personnel who is appointed by the AC to undertake the role of coordinating all whistleblowing related activities
"Policy / WB Policy"	Refers to OSKVI Group's Whistleblowing Policy
"whistleblowing"	Refers to an act where any of the employees of OSKVI Group or members of the public raises concern(s) about any improper conduct occurring within OSKVI Group
"whistleblower"	Refers to any of the employees of OSKVI Group or members of the public who raises concern(s) about any improper conduct occurring within OSKVI Group
"whistleblowing event"	Refers to a case arising from whistleblowing

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 5 of 12

A. POLICIES

A1. Overview

1. Introduction

- OSKVI Group is committed to achieving and maintaining a high standard of integrity, accountability and ethical behaviour in the conduct of its businesses and operations.
- In line with the above, OSKVI Group has established WB policy to provide an avenue for all employees of OSKVI Group or members of the public to raise concerns about any suspected and/or known improper conduct that they may observe, occurring within OSKVI Group.

2. Objectives

- WB policy is designed to:
 - support OSKVI Group's values; and
 - ensure that employees or members of the public can raise concerns without fear of reprisals, unfair treatment or practices

3. Coverage

- Improper conduct includes, but is not limited to the following:
 - fraud;
 - corruption, bribery or blackmail;
 - theft, embezzlement and unauthorised use of OSKVI Group's assets;
 - unauthorised disclosure or distribution of confidential trade secrets and other relevant information of OSKVI Group;
 - improprieties in matters of financial reporting;
 - providing deceptive, misleading or false information about corporate transactions, including suppression of material information;
 - acts or omissions which are deemed to be against the interest of OSKVI Group, laws, rules and regulations;
 - failure to comply with legal or regulatory obligation;
 - criminal offences;
 - endangerment of an individual's health and safety;
 - deliberate concealment of any of the above matter or other acts of wrongdoing.
 - conduct which may cause financial loss to OSKVI Group or bring it to severe public disrepute or ridicule or is otherwise detrimental to OSKVI's interests; and
 - assisting or directing a person to commit any of the above improper conduct.

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 6 of 12

- All employees must report any suspected and / or known improper conduct.

Note: Refer to [A2.1 Guiding Principles](#).

4. Limitations

- This Policy does not, however, cover any issues or concerns in relation to matters:
 - Which are trivial or frivolous grievances;
 - Which are motivated by malice;
 - Which relate to OSKVI Group's products and services, for there are established channels at the respective company level to help resolve; or
 - Which are pending or are in progress and/or have been decided by/in any court of law, tribunal or regulatory authority/agency.

5. Reference

- WB policy should be read in conjunction with the following:
 - Whistleblower Protection Act 2010;
 - OSKVI Employee Code of Conduct;
 - OSKVI Anti-Bribery and Anti-Corruption Handbook;
 - OSKVI Disciplinary Procedures; and
 - OSKVI Whistleblowing Operations Manual.

6. Intended Audience

- This WB Policy shall be read, acknowledged and adhered to by all employees of OSKVI Group, which includes permanent, temporary and contract employees (collectively referred to as "employees").

7. Review and Notice

- WB Policy does not replace any other existing corporate complaints' policy and / or procedures.
- In the interests of maintaining best practice, the contents of this WB Policy will be reviewed every three (3) years, or earlier, if necessary.
- This WB Policy will be circulated to all existing and new employees of OSKVI Group.

End

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 7 of 12

A. POLICIES

A2. Whistleblowing

1. Guiding Principles

- The principles underpinning WB policy are as follows:
 - All concerns raised via the predefined channels using the prescribed form will be treated fairly and properly;
 - Harassment or victimisation of any employee or member of the public who has raised a genuine concern will not be tolerated;
 - Whistleblower making a disclosure will retain anonymity unless he or she agrees otherwise or to such extent permitted under the applicable law;

Note: Identity of the whistleblower will be disclosed to AC Chairman and Management for the purpose of identifying a suitable person to conduct the investigation.

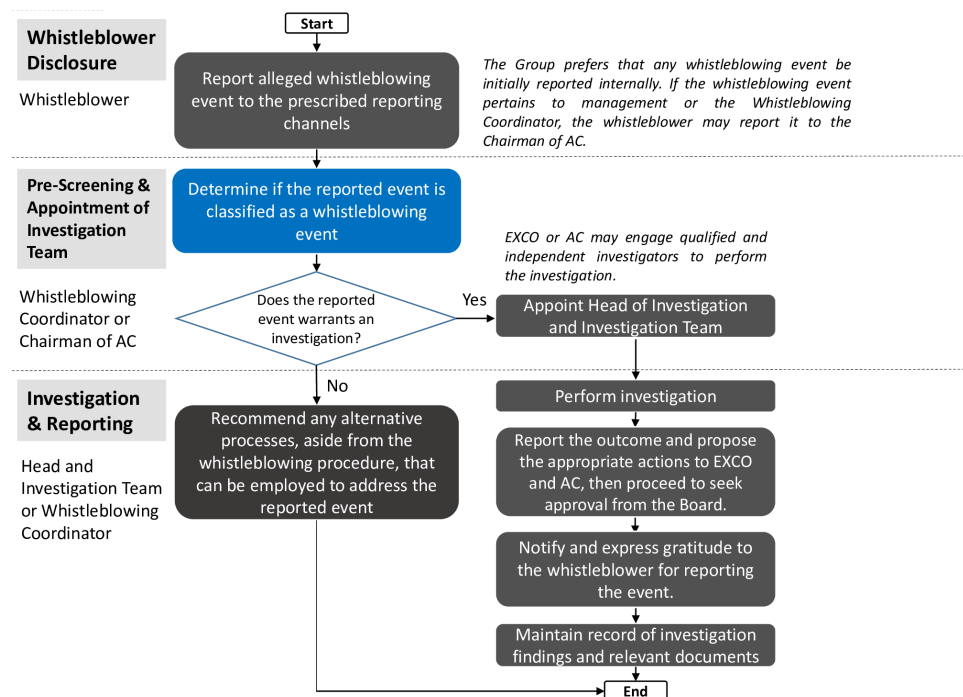
Refer to [A2.6 Anonymous Whistleblower](#) for further details.

- All whistleblowers who have acted in good faith will be conferred with the following protection:
 - Protection of confidential information; and
 - Protection against detrimental action.
- OSKVI Group will ensure that any employee or member of the public raising a concern is aware of the procedures involved in handling the matter.
- WB policy is not set up to deal with staff grievances, for which separate procedures exist.

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 8 of 12

2. Whistleblowing Procedure

- The following diagram summarises the flow for Whistleblowing Procedure:



OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 9 of 12

3. Reporting Channels

- Whistleblowers can lodge a suspected and / or known improper conduct by submitting the following information to the prescribed reporting channels:
 - Name of whistleblower
 - Contact number of whistleblower
 - Details of person(s) involved
 - Nature of concern(s)
 - When and where the incident took place and provide evidence, if possible
- The prescribed reporting channels are as follows:
 - Email to Whistleblowing Coordinator via the dedicated email, whistleblowing@oskvi.com;
 - Email to Chairman of Audit Committee via the dedicated email, acchairman@oskvi.com; or
 - Post to Whistleblowing Coordinator at the following address:

Attn: Whistleblowing Coordinator,
OSK Ventures International Berhad,
Level 11, Plaza OSK, Jalan Ampang,
50450 Kuala Lumpur, Malaysia.
 - Contact the Whistleblowing Coordinator directly through the dedicated hotline number at 03-21610662.
- Information on reporting channels are made available on OSKVI Group's website for ease of reference.
- The Management may recommend any changes to the existing reporting channels and the changes shall be tabled to the Audit Committee for approval.
- In event that the whistleblowing relates to Management of OSKVI, the whistleblower may opt to direct his / her concern to the Chairman of Audit Committee.

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 10 of 12

4. Protection Afforded

- The whistleblower would be protected from unfair treatment or practices including but is not limited to:
 - retaliation or harassment;
 - victimisation, threat or intimidation of termination / suspension of service or contract;
 - disciplinary action;
 - transfer;
 - demotion;
 - withholding of promotion or bonus / payment; and
 - any direct or indirect use of authority to obstruct the employee's right to continue to perform his / her duties / functions, including making further disclosures.
- If a whistleblower raised a concern on improper conduct in good faith, but the concern is not able to be confirmed following an investigation, no action will be taken against the whistleblower.
- Investigator(s) and person(s) involved in the investigation and who have acted in good faith and with propriety shall also be accorded the same protection as the whistleblower.
- However, any whistleblower who has not acted in good faith shall not be entitled to any protection under this Policy, and may be subject to appropriate action, including but not limited to disciplinary action or legal action.
- The whistleblower is deemed to be not acting in good faith, if it is of the opinion, based on investigation or in the course of investigation that:
 - the whistleblower has participated in the improper conduct raised;
 - the whistleblower wilfully raised concern on the improper conduct which he / she knew or reasonably should have known that is false;
 - where the whistleblower raised a concern of improper conduct frivolously, maliciously, for personal gain or self-interest; or
 - the report of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.
- In the event where it is determined, based on investigation or in the course of investigation, that the whistleblower or any individual assisting with the investigation has deliberately abused the protections afforded as stipulated in this Policy, OSKVI Group reserves the right to revoke the protection.
- Should any incident of abuse of protection is noted, WB Coordinator will assess and report the said incident to EXCO or the AC. EXCO or the AC will decide on the revocation of protection afforded.

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 11 of 12

- 5. Confidentiality**
- All reported concerns will be treated with confidentiality and are to be kept protected against any unauthorised use and access. However, confidentiality will be maintained to the extent possible within the limitations of law and the legitimate needs of the investigation.
 - Individuals who are involved in or who are assisting with an investigation in any capacity are also required to uphold strict confidentiality.
 - In instances where OSKVI is compelled to disclose the whistleblower's identity in accordance with the relevant laws, Court Order or written directive issued by a regulatory body (whether local or foreign), OSKVI may disclose the information to the extent required by the relevant laws, Court Order or regulatory body.
- 6. Anonymous Whistleblower**
- Any employee or member of the public who wishes to raise concern on improper conduct is required to disclose his / her identity (which will be kept confidential) to OSKVI Group to facilitate OSKVI Group to clarify or obtain further information for purposes of further investigation into the improper conduct and accord the necessary protection to him / her.
 - The identity of the whistleblower will be disclosed to the Chairman of AC and the Management for the purpose of identifying a suitable and impartial person to conduct the investigation. The Chairman of AC and the Management must procure that the person(s) who are appointed to conduct the investigation must similarly uphold strict confidentiality.
 - However, if the reported whistleblowing event involves the Chairman of AC and/or the Management, the identity of the whistleblower will not be disclosed to them.
 - OSKVI Group does not encourage anonymous whistleblowing, and as such, any anonymous whistleblowing will not be investigated unless the Management in concurrence with the AC Chairman decide at their sole and absolute discretion to make an exception based on compelling evidence provided by the whistleblower.
- 7. Safekeeping of Records**
- All concerns received in writing together with the relevant investigation documents must be retained by OSKVI Group for a minimum period of seven (7) years.
 - All reports, its supporting evidence, findings of investigations and monitoring of corrective actions shall be maintained and monitored by WB Coordinator.

OSK Ventures International Berhad [200301033696 (636117-K)]	15 November 2023
Internal Audit	OSKVI-IA-POL-001-3
Whistleblowing Policy	Page 12 of 12

- Disclosure of any of the investigation documents / information to individuals who are not involved in the investigation will be viewed as a serious disciplinary offence which may result in disciplinary action, including termination of employment or dismissal.

8. Rewards

- OSKVI may consider offering a reward to a whistleblower, at the Management's sole and absolute discretion.
- In this regard, the decision of whether to offer a reward, and the quantum of the reward shall be determined based on the significance of the case and its impact on OSKVI, the amount of information provided by the whistleblower and the level of assistance and co-operation offered by the whistleblower.

9. Duties and Functions of AC in Relation to Whistleblowing

- AC shall provide oversight function over the administration of this Policy.
- In relation to whistleblowing, AC is given the authority to:
 - ensure that appropriate infrastructure, resources and systems are in place for effective implementation of the whistleblowing practices;
 - recommend appropriate guidelines on the conduct of investigation and inquiry into the whistleblowing event received;
 - ensure that the confidentiality of information received in relation to the whistleblowing event and confidentiality of the whistleblower's identity is maintained to the fullest extent possible;
 - establish procedures for reporting and handling whistleblowing events, including but is not limited to:
 - appointment of WB Coordinator to handle whistleblowing events received and to maintain a record of whistleblowing events;
 - establish a mechanism to verify that the whistleblowing events received relate to matters covered under WB policy;
 - appointment of the Head of Investigation Team involved in the conduct of investigation on whistleblowing event;
 - appointment of external adviser(s) to assist with the conduct and investigation of whistleblowing event received, where necessary;
 - advise the BOD on the progress, findings and recommendation that require the BOD's attention and approval;
 - recommend to the BOD for prompt and appropriate corrective actions to be taken based on the outcome of investigation; and
 - ensure no detrimental action is taken by OSKVI Group against the whistleblower, investigator(s) and person(s) involved in the investigation who have acted in good faith.

End