

W T K HOLDINGS BERHAD

(Incorporated in Malaysia) (10141-M)

WHISTLEBLOWING POLICY

1. INTRODUCTION

W T K Holdings Berhad (“the Company” or “WTK”) is committed to maintain the highest possible standards of ethical and legal conduct within WTK and all its subsidiary companies (“WTK Group”).

This policy is to provide an avenue for all employees of WTK Group and its stakeholders to raise genuine concerns about unethical behaviour, illegal acts or possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

This policy is designed to:-

- Ensure that employees and/or stakeholders can raise concerns without fear of reprisals;
- Provide a transparent and confidential process for dealing with concerns;
- Promote good corporate governance and uphold the integrity of all operational activities and business dealings.

Examples of matters that should be reported include, but not limited to the following:-

- Fraud;
- Corruption, Bribery or Blackmail;
- Abuse of Power;
- Conflict of Interest;
- Theft or Embezzlement;
- Misuse of Company’s Property;
- Failure to comply with Legal or Regulatory obligations;

2. PRINCIPLES

The Principles that underpin the Policy are as follows:-

- All concerns raised will be treated fairly and properly;
- The Company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;
- The Company will ensure that the individual raising a concern is aware of the person handling the matter; and
- The Company will ensure there is no form of reprisal as a result of raising a mistaken concern. The Company, however, does not extend this goodwill to anyone whom maliciously raise a matter he/she knows is untrue.

3. COMMUNICATION CHANNEL

- a) Report or disclosure under this Policy is be made to the Senior Independent Director, being the Audit Committee Chairman of WTK, through the following e-mail:-

Senior Independent Director

Name : Ms Tham Sau Kien

Email : wtkholdings@gmail.com

- b) Employees of WTK Group should report or disclose under this Policy to his/her immediate Superior or Head of Department. However, if for any reason the employee is reluctant or unable to do so, then the employee should report to the Senior Independent Director, as mentioned in above (a).

4. PROTECTION OF WHISTLEBLOWER

- a) A Whistleblower will be accorded with protection of anonymity to the extent most practicable. In addition, if the Whistleblower is an employee, he/she will be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the WTK Group, to the extent reasonably practicable, and that the disclosure is made in good faith. Such protection is accorded even if investigations reveal that the Whistleblower was mistaken as to alleged misconduct.
- b) An anonymous disclosure will not be entertained. Any employee or stakeholder who wish to report an improper conduct is required to disclose his identity to the Company in order for the Company to accord the necessary protection to him/her. However, the Company reserves its right to investigate into any anonymous disclosure it saw fit.

5. GRIEVANCE PROCEDURE

The Whistleblower who has raised concerns will be informed of the person handling the matter and how to initiate contact.

If the Whistleblower fail or refuse to provide Supporting Documents or Evidences, then an investigation cannot proceed and the complaint is deemed false or an act of revenge. This is to safeguard the check and balance necessary for both the Whistleblower and the person complained against.

If required, the Senior Independent Director can obtain assistance or assign a person from Management or other resources of the Group to investigate the concerns raised.

Upon completion of the investigations, the person/persons tasked with investigating is required to report all concerns raised, the status of the investigations and any action taken or to be taken as a result of the investigations, to the Senior Independent Director or any person who has been assigned by the Company.