Focus Dynamics Group Berhad
(Company No. 200201015261 (582924-P))

Whistleblowing Policy

Background

1. In line with corporate governance best practice, Focus Dynamics Group Berhad, ("the Company") has revised its Whistleblowing Policy in November 2017 to provide a channel for internal staff to report corporate wrongdoings. A review on this Policy was completed, which resulted in three key changes, namely:
   a. Outsourcing of reporting channels to an external independent party, Polaris Corporate Solutions Sdn Bhd ("Polaris"), which provides whistleblower with greater assurance of anonymity;
   b. Clearer definition of corporate wrongdoings covered by the Policy;
   c. Revised reporting and investigation processes arising from (a).

2. A further review was recently completed in February 2020 which resulted in the following key changes:
   a. Coverage of the Policy expanded;
   b. Responsibility and protection of the whistleblower enhanced;
   c. Success measures included in the Policy.

Coverage

3. The Policy is meant for reporting by internal staff. Internal staff include any person directly or indirectly employed (e.g. through recruitment agencies) by the Company to carry out official duties on behalf of the Company. This includes permanent, contract and temporary staff, i.e. any person who is issued the Company's official staff pass. All divisional levels of staff, including Core Management (i.e. Chief Executive Officer, Executive Directors, Chief Financial Officer and etc.) are included.

4. As the Policy is meant for reporting by the Company's staff only, staff are not to reveal the whistleblowing hotline number and reporting channels to parties external to the Company.

Purpose

5. This Policy is part of the Company's corporate governance control and aims to strengthen the Company's accountability.

6. More importantly, the Policy aims to:
   a. Protect the whistleblower:
      The identity of the whistleblower is protected as it will be kept in confidentiality by Polaris, unless he/she chooses to reveal it. The whistleblower may also choose to remain anonymous. Every effort will be made not to reveal the identity to the extent feasible and permissible under the law.

   b. Protect the victim:
      The identity of the victim is protected and will not be disclosed to others, except those staff conducting the investigation.

   c. Protect the staff reported upon:
      The identity of the staff reported upon is protected and will not be disclosed to others, except those staff conducting the investigation. No disciplinary action will be taken against the staff reported upon until due investigation process is completed and reveals that there is a genuine wrongdoing committed.

   d. Protect the organization:
      The Policy offers the Company the opportunity to have first-hand knowledge of wrongdoings committed and take relevant actions early before any further loss or damage to the Company.

Scope

7. This Policy covers the following act(s) of corporate wrongdoing by internal staff:
   a. Illegal activities, such as
      1. Fraud
      2. Theft

   b. Corruption
      1. Bribery
      2. Financial Statement Fraud

   c. Breach of internal policies
   d. Conflict of interest.

8. Personnel issues such as workplace grievances, and Health and Safety issues do not fall within the scope of the Policy and should be reported to the Human Resource Department.

Reporting Channels

9. Staff may whistleblow through the whistleblowing hotline or the supporting reporting channels manned by Polaris, an external vendor with expertise in fraud and whistleblowing management.

10. The reporting channels are as follows:

Channels	Description	Details
(a) Telephone	Dedicated hotline	03-7890 2455
(b) Email	Dedicated email address	focusdynamics@myspeakup.com
(c) Website	Dedicated website	http://myspeakup.com/focusdynamics

11. These channels mentioned above can also provide confidential advice to staff if they face ethical dilemma or need guidance on the right channel to report to.

12. Alternatively, staff can report directly to their supervisors, who would in turn report it through the whistleblowing hotline for cases that fall within the scope of the Policy, while keeping the staff's identity anonymous where possible.

13. In alignment with the values of being a good staff, it is the responsibility of every staff of the Company to make a report when he/she comes into the knowledge of suspected fraudulent activity within the Company.

14. For alleged or suspected corrupt activities, the Company must refer the reported allegation or complaint to the Malaysian Anti-Corruption Commission ("MACC") for investigation and must not conduct any initial inquiry to ascertain the truth as it could jeopardize the investigation that must be done by the MACC.

Responsibility and Protection of whistleblower

15. Whistleblowers must act in good faith and have reasonable grounds for believing the information disclosed indicate concerns of suspected improper activities or behaviour. Although the whistleblower is not expected to prove the truth of an allegation, the whistleblower needs to provide facts and evidence in support of the concerns.

16. If an allegation is made in good faith, but it is not confirmed by an investigation, no action will be taken against the whistleblower. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action will be taken against the whistleblower.

17. The whistleblower's employment, remuneration and career opportunities will not be jeopardised for the reason of making a report if the report is made in good faith. If the whistleblower is of the opinion that this has occurred, the whistleblower may make an appeal to Human Resource.

18. The Company and the external vendor will not disclose the whistleblower's identity without the whistleblower's consent, unless required by the court or other regulatory authorities to disclose the identity.

19. Blowing the whistle does not lessen the guilt or criminal liability of a whistleblower who is involved in wrongdoing, although this might be taken into account.

20. The Company will not tolerate victimisation of the whistleblower, and considers this serious misconduct. Disciplinary action will be taken against those who victimise the whistleblower.

Investigation Process and Reporting

21. All details on the case(s) will be forwarded by the Polaris to the Whistleblowing Team. The Whistleblowing Team consists of the Executive Director and Independent Non-Executive Director.

22. The disclosure report forwarded to the Whistleblowing Team would include recommendations by Polaris, and the Whistleblowing Team would make a decision whether to proceed with an investigation.

23. Whistleblowers who would like to be informed of the status of the investigations or follow-up may do so by contacting the Polaris. The Company will provide a brief update to Polaris every 28 days until the case is closed. The whistleblower may be contacted by the Polaris for more information where required.

Punishment for Wrongdoings

24. The possible punishments for wrongdoings include:
    a. Breaches of Law
        - Criminal penalties
        - Civil penalties
    b. Violating the Code of Conduct
        - Correction actions
        - Disciplinary actions
        - Termination of appointment

Policy Review and Success Measures

25. The whistleblowing policy will be reviewed periodically for its effectiveness.
26. The success of the whistleblowing programme will be measured periodically by the level of awareness and satisfaction.