



Whistle-Blowing Policy

Date: 19/10/2022

Innity Corporation Berhad

(Company No. 200701006554 (764555-D))

1.0 Introduction

1.1. All employees are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

1.2. This policy is designed to:

- Support the company's value;
- Ensure employees can raise concerns without fear of reprisals; and
- Provide a transparent and confidential process for dealing with concerns.

1.3. This policy not only covers possible improprieties in matters of financial reporting, but also:

1.3.1. Fraud;

1.3.2. Corruption, bribery or blackmail;

1.3.3. Criminal offences;

1.3.4. Failure to comply with a legal or regulatory obligation;

1.3.5. Miscarriage of justice;

1.3.6. Endangerment of an individual's health and safety; and

1.3.7. Concealment of any or a combination of the above.

2.0 Principles

2.1. The principles underpinning the policy are as follows:

2.1.1. All concerns raised will be treated fairly and properly;

2.1.2. The company will not tolerate harassment or victimization of anyone raising a genuine concern;

2.1.3. Any individual making a disclosure will retain anonymity unless the individual agrees otherwise;

2.1.4. The company will ensure that any individual raising a concern is aware of who is handling the matter; and

2.1.5. The company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The company, however, does not extend this assurance to someone who maliciously raises a matter he / she knows is untrue.

3.0 Whistle-Blower Channel

3.1. If any employee believes reasonably and in good faith that malpractice exists in the work place, the employee should report this immediately to the line manager. However, if for any reason the employee is reluctant to do so, then the employee should report the concern via the following channels

| Name | Audit Committee | Board of Directors | Email |
|--------------------------------|-----------------|------------------------------------|--|
| Mr. Cheong Chee Yun | Chairman | Independent Non-Executive Director | cheeyun88@yahoo.com |
| Mr. Fung Kam Foo, Alan | Member | Independent Non-Executive Director | alankffung@gmail.com |
| Puan Norliza Binti Rasool Khan | Member | Independent Non-Executive Director | norlizakhan@gmail.com |

Any report can be submitted confidentially via email to any of the above Independent Non-Executive Director

The above-mentioned persons will provide the employee counselling advice. Your concerns will be reported to the company without revealing your identity.

3.2. Employees’ identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can be preceded.

4.0 Procedures: Initiation

4.1. All employees are encouraged to raise genuine concerns about impropriety at the earliest opportunity, and in an appropriate way. Conduct becomes reportable when it happens or when it is reasonably likely to occur.

4.2. As a first action, a whistle-blower should raise concerns using the method below:

4.2.1. A report should be raised with the employee’s manager who will then notify the Audit and Risk Management Committee. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the misconduct. The manager must undertake to treat all allegations in a confidential and sensitive manner, as set out in this Policy.

The manager notified:

- Has the responsibility to ensure that concerns raised are taken seriously.

- Where appropriate, should investigate properly and make an objective assessment of the concern.
 - Has the responsibility to ensure that the action necessary to resolve a concern is taken.
 - Must keep the employee advised of progress.
- 4.2.2. However, if for some reason the whistle-blower does not feel comfortable to report through his or her manager, then he or she has the right to bypass the management structure and take his concerns directly to the Audit and Risk Management Committee.
- 4.3. Concerns must be raised in writing in email. The following information must be available in order for the Audit and Risk Management Committee to proceed with the investigation:
- 4.3.1. Background of the individual initiating the allegation:
Name, Department and Office (if he or she is an employee) or Name and Company of the individual and his or her relationship to Innity (if he or she is not an employee)
- 4.3.2. Date(s), details and reasons why the individual is concerned about the conduct:
While the individual is not expected to prove beyond doubt the truth of the allegation or provides supporting documents at the initiation stage, the individual needs to demonstrate that there are reasonable grounds for his / her concerns.
- (Refer to **Attachment 1** for sample format of report)*
- 4.4. The individual may independently engage professional advice or guidance on how to pursue the matter before coming forth. The individual may have colleagues, friends or legal adviser present during any meetings or interview with the Audit and Risk Management Committee.

5.0 Procedures- Investigation & Follow-up

- 5.1. The Audit and Risk Management Committee is committed to investigate and address all cases of reported misconduct. The Audit and Risk Management Committee shall:
- 5.1.1. Receive and filter complaints
 - 5.1.2. Determine actions to be taken
 - 5.1.3. Assign investigations
 - 5.1.4. Ensure closures and conclusion
 - 5.1.5. Report to the relevant authorities
- 5.2. The Audit and Risk Management Committee will ensure that the individual raising a concern is notified of the person (owner) who is handling the matter.

5.3. In order to protect individuals and those accused of misconduct, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The concern raised may :

- 5.3.1. Require immediate remedial action before the investigation is conducted or concluded.
- 5.3.2. Be investigated internally by management, internal audit and independent inquiry or through a disciplinary process.
- 5.3.3. Be referred to the Board of Directors for further action
- 5.3.4. Be referred to law enforcement for criminal investigation

5.4. Based on the level of Severity, the Audit and Risk Management Committee shall determine the channel for investigation and follow-up action.

| Severity Level | Channel | Findings to report to |
|-----------------------|-------------------------------------|-------------------------------------|
| 1 | Audit and Risk Management Committee | Audit and Risk Management Committee |
| 2 | Delegated to Senior Management | Audit and Risk Management Committee |

The members of the Senior Management shall be:

- Executive Chairman
- Group Managing Director
- Executive Directors

5.5. The whistle-blower may seek follow-up information about an investigation of a report or any consequent action taken. Subject to legal limitation, the whistle-blower will be kept informed of the final outcome of the investigation.

6.0 Reports to the Board of Directors

- 6.1. The Audit and Risk Management Committee shall update the Board of Directors on the progress and conclusion of each investigation on a periodic basis.
- 6.2. If there are matters that require the Board’s attention immediately, the Audit and Risk Management Committee may request the Company Secretary to arrange for an ad-hoc meeting.

ATTACHMENT 1
WHISTLE BLOWING REPORT
The Reporting Individual (if not anonymous)

Name:

Contact Number: Email:

Company/Department:

Date: Time:

The Report

Parties Involved (kindly use a separate sheet if more space is required)

| | Party 1 | Party 2 |
|------------|---------|---------|
| Name | | |
| Position | | |
| Department | | |
| Company | | |
| Location | | |

Date / Period of Incident :

Means of Discovery :

Other Witness / Source :

Evidence/Reference :

Documents :



ATTACHMENT 1 (Continued)

WHISTLE BLOWING REPORT

Details of the Report :

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Impact to Innity Group :

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Report Received by

Name:

Date:

Time: