

GDEX Whistleblowing Policy and Procedures

INTRODUCTION

We, at GDEX Group are committed to applying the highest standards of ethical conduct, integrity and accountability in all our business activities and operations in compliance with anti-bribery and related laws, and ISO 37001:2016 Anti-Bribery Management System (ABMS) that are applicable to the organization.

In this regard, GDEX is committed to implementing Whistleblowing Policy and Procedures (WBPP) under the Whistleblower Protection Act 2010, guided by the following principles:

- To encourage culture of openness, accountability and integrity
- To establish formal mechanisms for reporting
- To establish clear communications about the process of reporting
- To ensure confidentiality and anonymity
- To prevent punishment or unfair treatment of whistleblower who reports in good faith
- To ensure no mis-use of whistleblowing procedure
- To safeguard position of the person who is subject of report
- To notify reporter of outcome of findings

OBJECTIVES

- 1) To ensure all GDEX employees and stakeholders, through understanding the WBPP, will come forward to express his or her concerns about a (suspected) malpractice or improper governance, without fear of punishment or unfair treatment.
- 2) Provide proper internal reporting channel to disclose any improper or unlawful conduct in accordance with the procedures provided in this WBPP.
- 3) Address a disclosure in an appropriate and timely manner.
- 4) Provide protection for the whistleblower from reprisal as a consequence of making disclosure and to safeguard whistleblowers' confidentiality.
- 5) Treat both whistleblower and alleged wrongdoer fairly.

This WBPP will guide GDEX employees and stakeholders on how to raise such concerns.

DEFINITION

Whistleblowing is a term used for what is legally known as Public Disclosure, which is when employees and stakeholders disclose information about malpractice or wrong doing they discover occurring in GDEX.

Whistleblower is a person making a protected disclosure. He/she shall provide initial information related to a reasonable belief that a malpractice or improper governance activity has occurred. He/she is not an investigator and does not have a right to participate in any investigative activities other than as requested by the investigators.

WHAT TO REPORT

The malpractices or wrongdoings that an employee / stakeholder should report under WBPP are:

- non-compliance to laws and regulations
- financial malpractice
- misuse of GDEX funds or assets
- deliberately or accidentally steal, damage or misuse the data stored within GDEX computer systems
- discrimination
- danger to public or employee health and safety
- suspected fraud or criminal activity
- corruption, bribery or blackmail
- breach of confidentiality
- breach of GDEX Code of Ethics and Conduct as stipulated in GDEX Employee Handbook or non-compliance with GDEX policies and procedures
- sexual assault or sexual harassment
- concealment of any of the above malpractice
- any other similar or related irregularities

The procedures under WBPP should NOT be used for:

- poor performance
- lack of professionalism
- personal disputes
- personal grievances

Sometimes it is not clear whether a particular action falls under the malpractices described above. In such cases, the whistleblower can seek advice from the Whistle Blowing Governance Unit (WBGU) for further direction.

The intentional filing of a false report, whether orally or in writing is itself considered an improper act which GDEX has the right to act upon.

IMPORTANCE OF WBPP TO GDEX

- Enable management to be informed at an early stage about possible contraventions
- support a culture of openness, accountability and integrity
- ensure good corporate governance and curb unethical and illegal practices at all levels
- minimize harm and damage to GDEX and its stakeholders

ROLE OF EVERY GDEX EMPLOYEE / STAKEHOLDER

- to be aware and understand the WBPP
- to understand the importance of whistleblowing
- to be encouraged to whistleblow on malpractices as listed above.

REPORTING RULES & PROCEDURES

- GDEX employee / stakeholder should report any malpractice or wrongdoing to the WBGU [Independent Director and Head of Corporate Office].
- The report can be made in the following manner:
 - a. by Email to WBGU (wbg@gdexpress.com)
 - b. by WhatsApp / SMS to handphone no: +60 16 339 0719
- The whistleblower can choose to remain anonymous or the whistleblower must disclose his/her name, NRIC number and contact details to be protected under the policy.
- The WBGU will ensure all information received will be kept in strictest confidence. The name of the whistleblower will be kept confidential at all times.
- The whistleblower will be given protection and will not be punished or treated unfairly if the reporting is made in good faith.
- If upon investigation by WBGU the reported concerns cannot be confirmed or may not have substance, no action will be taken against the whistleblower raising the concerns in good faith.
- The whistleblower will not be required to testify against the reported person in any hearings if this is requested by the whistleblower.
- An employee who misused the WBPP by purposely making a false report may have his/her employment reviewed.
- Until the investigation is completed & concerns proven without doubts, the confidentiality of the person who is the subject of the report will be safeguarded.
- WBGU will notify the whistleblower of the outcome of its findings within 30 days of receipt of report.

ASSURANCE

- Every effort will be made to treat the whistleblower's identity with appropriate regard for confidentiality. The identity of a subject should be maintained in confidence to the extent possible given the legitimate needs of law and the investigation.
- GDEX gives the assurance that it will not reveal the identity of the whistleblower to any third party not involved in the investigation or prosecution of the matter. The whistleblower making the allegation will retain anonymity to all other employees and public unless he or she agrees otherwise. Where concerns cannot be resolved without revealing the identity of the whistleblower (e.g. if the evidence is required in court), a dialogue will be carried out with the whistleblower concerned as to whether and how the matter can be proceeded.
- The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. GDEX is obligated to reveal confidential information relating to a whistleblowing report if ordered to do so by the court of law.
- The assurance of confidentiality can only be completed effectively if the whistleblower likewise maintains confidentiality.
- The WBGU will be impartial and independent to all parties concerned, have a duty of fairness, objectivity, thoroughness, ethical behaviour and observance of legal and professional standards.

CONCLUSION

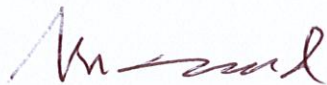
The Board of Directors of GDEX is strongly committed in having a strong whistleblowing culture and will, through the WBGU, regularly assess the company internal whistleblowing system.

GDEX employees / stakeholders are encouraged to provide suggestions and feedback on improving the company whistleblowing system.

POLICY REVIEW

This Policy will be reviewed as and when required to determine whether the Policy is effective in ensuring accurate, complete and timely disclosure in accordance with GDEX's disclosure obligations.

This Policy can be extended and revised by virtue of new legislations and rules issued by the relevant regulatory authorities.



Muhammad bin Ibrahim
Chairman

WBPP Flow Chart

