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Time Group Principles

# Whistleblowing Policy

# time<sup>TM</sup>

Version 7.0  
TIME/IA/SYED/2023/0  
07  
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## AMENDMENT RECORD

Date	Page		Summary of Change
	No.	Rev	
22.06.10	-	1	<p>CEO approved the proposed whistleblowing policy.</p> <ul style="list-style-type: none"> <li>Reviewed the whistleblowing policy;</li> <li>Updated the Company logo and policy format; designation of head of Internal Audit (Head of Group Internal Audit &amp; Compliance); replace COO with DCEO;</li> </ul>
26.11.13	-	2	
23.04.14	-	3	<p>DCEO approved the revised policy. Amended / added the following in pursuant to the new MCGG 2017:</p> <ul style="list-style-type: none"> <li>Enhanced the paragraph on “PURPOSE” of the policy by adding additional purposes;</li> <li>Removed the paragraph on “POLICY” and replaced with “PRINCIPLES”;</li> <li>Updated the designation of Chief Executive Officer (“CEO”) to Commander-in-Chief (“CIC”), and Executive Committee (“EXCO”) to Senior Management;</li> <li>Updated the “WHISTLEBLOWER PROTECTION” by adding paragraph on protection against whistleblower identity, appointed person to be contacted, and action against whistleblower if the whistleblower is found to have committed a wrongdoing; and</li> <li>Added an additional type of improper conduct in Appendix A.</li> </ul>
23.02.18	-	4	

## AMENDMENT RECORD

Date	Page		Summary of Change
	No.	Rev	
11.03.22	-	5	<p>Reviewed the whistleblowing policy:</p> <ul style="list-style-type: none"> <li>Enhanced the paragraph on “DEFINITION” of the policy by adding a sentence to emphasize that whistleblowers can also be someone from outside the organisation;</li> <li>Replaced the “Malaysian Code of Corporate Governance 2017” under “PURPOSE” paragraph with “Malaysian Code of Corporate Governance 2021”;</li> <li>Enhanced the paragraph on “PURPOSE” by synchronizing the group of people to whom the policy is applicable to with the paragraph on “SCOPE”;</li> <li>Updated the “REPORTABLE MISCONDUCT” by adding “Malaysian Anti- Corruption Commission Act 2009” under sub-point (b);</li> <li>Enhanced the paragraph on “COMMUNICATION CHANNEL” by synchronizing the group of people to whom the policy is applicable to with the paragraph on “SCOPE”;</li> <li>Removed internet/intranet as one of the whistleblowing channels under “COMMUNICATION CHANNEL”;</li> <li>Added the mobile number of Regional Head, Internal Audit and edited the Mailing Address under “COMMUNICATION CHANNEL”; and</li> <li>Updated the details of Audit Committee Chairman under “WHISTLEBLOWER’S PROTECTION”.</li> <li>Removed the paragraph on corrective/disciplinary actions to be taken against a person reporting in bad faith under “WHISTLEBLOWER’S PROTECTION”.</li> </ul>
24.11.22	15	6	<ul style="list-style-type: none"> <li>Updated the details of Audit Committee Chairman under “WHISTLEBLOWER’S PROTECTION”.</li> </ul>

Date	Page		Summary of Change
	No.	Rev	
21.11.23	-	7	<p>A gap analysis was performed by a third-party consultant on TIME's ABC policies and documents.</p> <p>Reviewed the whistleblowing policy following proposed changes:</p> <ul style="list-style-type: none"> <li>• Removed the sentence "Usually this person would be from that same organization" from clause 1.1 Definition.</li> <li>• Removed the sentence "to the media or to groups concerned with the issues" for whistleblowers to make allegations externally from clause 1.2 Purpose.</li> <li>• Added the "Malaysian Anti-Corruption Commission Act 2009, Amendment 2018), Whistleblower Protection Act 2010" in clause 1.2 Purpose.</li> <li>• Replaced "employees" with "any party" under clause 1.2 Purpose.</li> <li>• Replaced "any other parties with a business relationship with TIME" with "anyone within or outside the organization" under clause 1.2 Purpose.</li> <li>• Enhanced the paragraph on 1.2 Purpose to add "or anyone within or outside the organization" to ensure anyone can raise concerns without fear of reprisals.</li> <li>• Added a new area that the policy covers which includes "Breach of trust, abuse of power/ authority, forgery or alteration of any documents belonging to TIME, anti-competition behaviour, conflict of interest, breach of TIME policy, money laundering, racial discrimination, harassment, bullying &amp; sexual misconduct, damage to the environment, insider trading and malpractices".</li> <li>• Replaced "any other parties with a business relationship with TIME" with "anyone within or outside the organization" under clause 1.3 Scope.</li> </ul>

Date	Page		Summary of Change
	No.	Rev	
			<ul style="list-style-type: none"> <li>• Replaced “made known to all Employees of the company” with “easily accessible to all within or outside the organization” under 1.4 Principles.</li> <li>• Added a new principle “Allows for anonymous reporting if preferred” under 1.4 Principles.</li> <li>• Replaced “any other parties with a business relationship with TIME” with “anyone within or outside the organization” under clause 4.0 Communication Channel.</li> <li>• Added “Malaysian Anti-Corruption Commission (MACC)” as a third party which the Regional Head, Internal Audit can disclose the identity of the whistleblower.</li> <li>• Removed Commander-In-Chief’s name from Clause 6.0 persons to contact</li> <li>• Added the below paragraph under clause 10.0 Action Plan.</li> </ul> <p>“This may include:</p> <ol style="list-style-type: none"> <li>a) terminating, withdrawing from or modifying TIME’s involvement in the project, transaction or contract identified in the report;</li> <li>b) repaying or reclaiming any improper benefit obtained;</li> <li>c) disciplining responsible personnel (which, depending on the severity of the issue, could range from a warning for a minor offence to dismissal for a serious offence);</li> <li>d) reporting the matter to the authorities; and</li> <li>e) if bribery has occurred, take action to avoid or deal with any possible consequent legal offences</li> </ol>

Date	Page		Summary of Change
	No.	Rev	
			<ul style="list-style-type: none"> <li>Enhanced the paragraph under 13.0 Policy Review by adding “the level of awareness and understanding of the policy among employees”</li> <li>Added a new list of complaint under Appendix A as follows: - <p>Breach of trust, abuse of power/ authority, forgery or alteration of any documents belonging to TIME, anti-competition behaviour, conflict of interest, breach of TIME policy, money laundering, racial discrimination, harassment, bullying &amp; sexual misconduct, damage to the environment, insider trading and malpractices;</p> <p>Upon presenting the changes to the Audit Committee, the following further amendments were requested by the AC and Management:</p> <ul style="list-style-type: none"> <li>Removed the Company’s reporting obligation to the whistleblower by deleting the sentence “<i>Once the investigation is complete, the appropriate Company representative may inform the whistleblower of the results of the investigation as well as any corrective steps that are taken.</i>” from item 9.0 Reporting. As agreed, the Company did not have the responsibility to report the outcome of investigation and action taken to the whistleblower</li> <li>Removed the paragraph (12.0) on Incentive</li> </ul> </li> </ul>

Date	Page		Summary of Change
	No.	Rev	
18.06.24	-	8	Minor Change was made: <ul style="list-style-type: none"> <li>Item 4.0 Communication Channel- Removal of the mobile number of Regional Head, Internal Audit from the Telephone number</li> </ul>

## 1.0 Whistleblowing Policy

### 1.1 Definition

A whistleblower is a person who raises a concern about suspected or actual wrongdoing occurring in an organisation or body of people. This person could either be someone within or outside the organisation. The revealed misconduct may be classified in many ways; for example, a violation of a law, rule, regulation and / or a direct threat to public interest, such as fraud, health / safety violations, and corruption. Whistleblowers may voice or raise their concern internally (for example, to other people within the accused organisation) or externally (to regulators, law enforcement agencies,).

### 1.2 Purpose

In line with the Malaysian Anti-Corruption Commission Act 2009 (revised Amendment 2018), Whistleblower Protection Act 2010 and the Malaysian Code on Corporate Governance 2021, TIME dotCom Berhad (“TIME” or “Company”) and its group of subsidiaries (“TIME Group” as defined in Section 1.3 below) has adopted a Whistleblowing Policy, which outlines TIME Group’s commitment to encourage any party 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.

This Whistleblowing Policy provides clear procedure and framework by which employees, directors, shareholders, consultants, vendors, contractors, agency, customers or anyone within or outside TIME Group can confidently, and anonymously if they wish, voice concerns or complaints regarding any act or conduct that is in violation of the rules of conduct and laws, actual or suspected misconduct, illegal or unethical behaviour without fear of potential discrimination against them.

This Policy is designed to:



Promote and maintain high transparency and accountability in the workplace;





Promote good corporate governance practices in the workplace;



Ensure that directors, staff, vendors, contractors, consultants or anyone within or outside the organisation can raise concerns without fear of reprisals and safeguard such person's confidentiality;



Protect a whistleblower from reprisal as consequence of making a disclosure;



Provide a transparent and confidential process for dealing with concerns;



Protect the long-term reputation of the Company;



Support the Company's values; and



Maintain a healthy working culture and an efficient Company.



Ensure that directors, staff, vendors, contractors, consultants or anyone within or outside the organisation can raise concerns without fear of reprisals and safeguard such person's confidentiality;

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



Negligence in carrying out work obligations;



Fraud;



Corruption, bribery or blackmail;



Criminal offences or any breach of the laws, regulations and directives where the wrongdoer knowingly or intentionally disregards compliance with such provisions;



Failure to comply with TIME's Code of Conduct including non-compliance with legal and regulatory obligation;



Miscarriage of justice;



Endangerment of an individual's health and safety; and



Breach of trust, abuse of power/ authority, forgery or alteration of any documents belonging to TIME, anti-competition behaviour, conflict of interest, breach of TIME policy, money laundering, racial discrimination, harassment, bullying & sexual misconduct, damage to the environment, insider trading and malpractices;



Concealment of any, or a combination, of the above

## 1.3 Scope

This Whistleblowing Policy applies to TIME Group (being TIME and all of its subsidiaries). All employees including full-time, part-time and temporaries, directors, shareholders, consultants, vendors, contractors, agency, customers or anyone within or outside the organisation are encouraged to come forward and disclose any wrongdoing that may adversely impact the Company.

## 1.4 Principles

The principles underpinning the Policy are as follows:



Internal procedures to facilitate necessary whistleblowing, in a timely and responsible manner, are in place and easily accessible to all within or outside the organisation;



All disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner so long as there is a basis for the concern and the disclosure is made in good faith and not for personal gain or motivated by ill or malicious intention;



The Company will not tolerate harassment or victimisation of anyone raising a genuine concern;



The identity and personal information of the whistleblower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law;



The whistleblower and the alleged wrongdoer will be treated fairly. The whistleblower will be informed of the status of their disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation);



Personal information, including the identity of the whistleblower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis;



Allows for anonymous reporting if preferred.

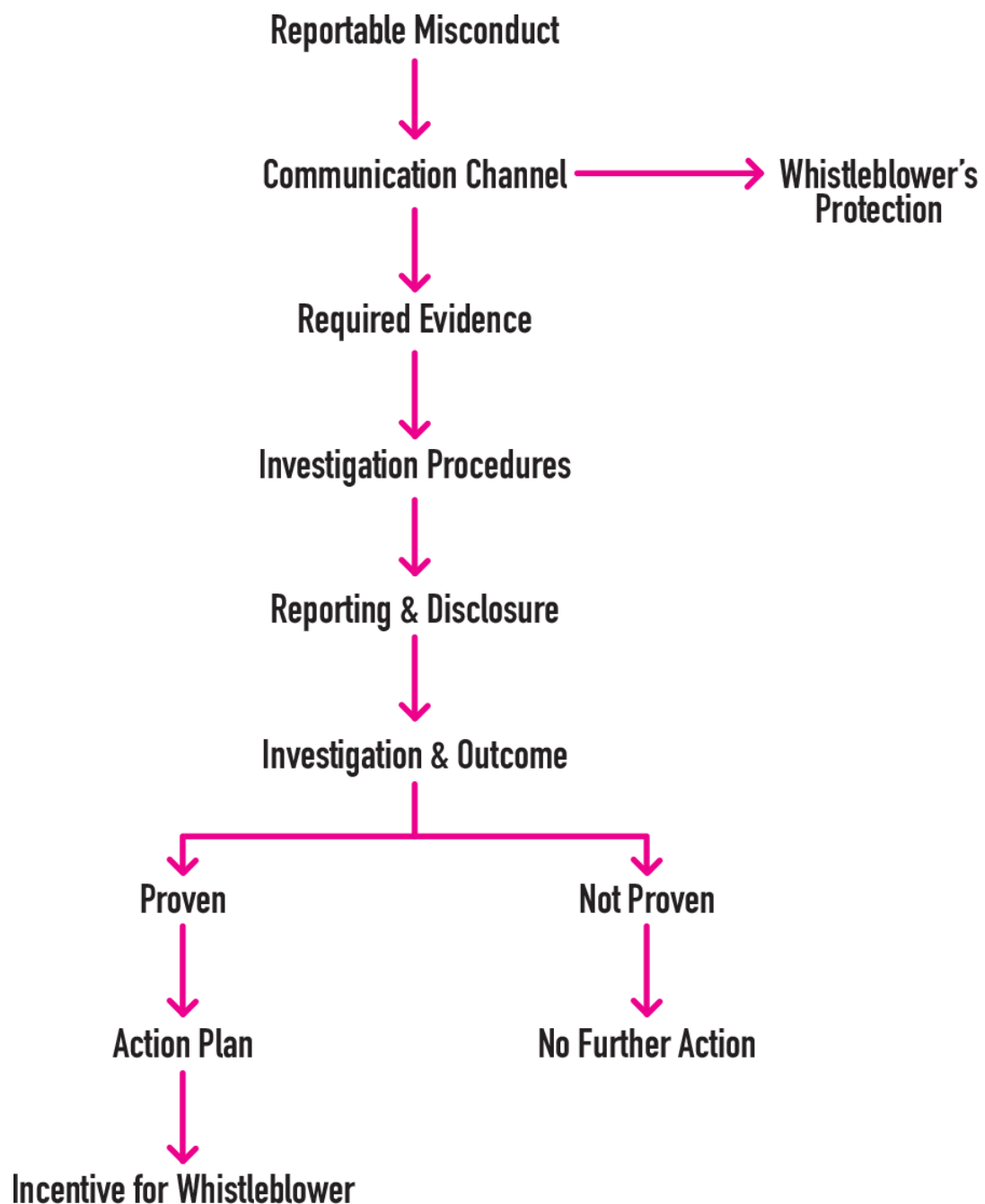


The Company will ensure no one will be at risk of suffering reprisal as a result of raising a concern even if the individual is genuinely mistaken. The Company, however, does not extend this assurance to someone who maliciously raises a matter they know is untrue; and



Any form of retaliation against individuals who have reported a wrongdoing or who have facilitated with the investigations is a breach of the principal obligation of all staff members to uphold the highest values and integrity.

## 2.0 TIME WHISTLEBLOWING POLICY FRAMEWORK



### 3.0 Reportable Misconduct

The following shall constitute 'Reportable Misconduct' under this Whistleblowing Policy:



Failure to comply with any legal and regulatory obligations;



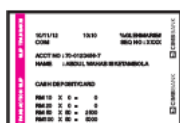
Conduct which violates any law or regulation including but not limited to Companies Act 1965, Computer Crimes Act 1997, MASB/FRS Standards, Anti Money Laundering & Anti-Terrorism Financing Act 2001, Malaysian Anti-Corruption Commission Act 2009 (Amendment 2018), Bursa Malaysia Securities Berhad and Securities Commission Listing requirements;



Breach of internal control, fraud or corruption;



Violation of the Company's procedures, policies or other rules of conduct;



Intentional misrepresentations directly or indirectly affecting financial statement;



Damage to the environment;



Danger to the health and safety of any individual;



Non-disclosure or deliberate concealment that is subject to either internal or external audit process;



Breach of confidentiality and privacy;



Serious non-professional or non-ethical behaviour; and



Breach of trust, abuse of power/ authority, forgery or alteration of any documents belonging to TIME, anti-competition behaviour, conflict of interest, breach of TIME policy, money laundering, racial discrimination, harassment, bullying & sexual misconduct, damage to the environment, insider trading and malpractices;



The deliberate concealment of information which could lead to any of the matters listed above

(Please refer to Appendix A for further details of reportable misconduct)



## 4.0 Communication Channel

The Whistleblower should initially communicate a Reportable Misconduct to the Regional Head, Internal Audit.

TIME also has provided various avenues which employees, directors, shareholders, consultants, vendors, contractors, agency, customers or anyone within or outside the organisation are encouraged to use to report allegations of wrongdoing or unethical business behaviour. Under this Policy, the Whistleblower can lodge a complaint or report through telephone, e-mail, fax, mail and may be made anonymously. The contact details are as follows:

Telephone	+60 3-5039 3756
E-Mail	<a href="mailto:whistleblower@time.com.my">whistleblower@time.com.my</a>
Fax	+60 3-5032 6589
Mailing Address	Regional Head, Internal Audit Level G, No.14, Jalan Majistret U1/26, Hicom Glenmarie Industrial Park, 40150, Shah Alam, Selangor, Malaysia

The contact information will also be published on the Company's intranet and website.

In the event the whistleblower suspects the Regional Head, Internal Audit is involved, they should communicate to one or more of the following persons within the Company:

- Chairman, Board Audit Committee
- Commander-in-Chief

## 5.0 Required Evidence

In order to comply with this Whistleblowing Policy, the Whistleblower is required to have reasonable grounds for suspecting the Reportable Misconduct (the complaint or concern).

The Whistleblower should, at a minimum, be required to provide in the complaint or report, whether in writing or telephone, information regarding the type of activity or conduct constitutes the Reportable Misconduct, identify the person(s) suspected as being involved, when it occurred and who was affected. The information has to be first-hand knowledge of the facts disclosed in the Report.

In the event there is insufficient evidence to support their allegation, the Whistleblower should not be discouraged from making a Report.

## 6.0 Whistleblower's Protection

TIME vendors, contractors or staff who lodge a complaint or report in good faith and in accordance with the Policy are protected against discrimination, harassment, being dismissed or penalized by TIME because of the complaint or report itself. Therefore, all TIME Employees, officers and contractors must not victimise any person, or cause any person to be victimised, just because a complaint or report was made under this Policy.

Victimisation could include intimidation, harassment, threats, and action causing injury, loss or damage, discrimination, disadvantage, adverse treatment in relation to a person's employment, career, profession, trade or business. TIME will regard any such victimisation very seriously and take appropriate action, which may include in the case of Employees, disciplinary action and / or dismissal.

Whistleblower's identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the whistleblower raising the concern (i.e. 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 progress further.

If a whistleblower reasonably believes that he / she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he/ she may consult or report to the appointed persons as below:

Name	Position	Contact	E-Mail
Syed Abdul Qader Bin Mohd. Ansari	Regional Head, Internal Audit	019-3322283	<a href="mailto:syed.qader@time.com.my">syed.qader@time.com.my</a>
Kuan Li Li	Audit Committee Chairman	+65 96311346	<a href="mailto:kuan.li.li@time.com.my">kuan.li.li@time.com.my</a>

Making a complaint under the Whistleblowing Policy does not shield the person from the consequences of being involved in any improper conduct or unlawful activity alleged in a complaint under the Policy. However, in some limited circumstances, a full and frank admission may be a mitigating consideration in respect of disciplinary or other action.

Employee and industrial relations related issues and human resources related issues are excluded from the operation of this Policy because there are other established mechanisms to raise such complaints.

Whistleblowers are strongly discouraged from making a Report in bad faith or based on unfounded allegations or containing malicious, slanderous or frivolous claims.

## 7.0 Investigation Procedures

Once the claim of misconduct is made, the Regional Head, Internal Audit is responsible to assess, investigate and report on the complaint or report and propose an action plan in a fair and timely manner.

The Regional Head, Internal Audit should not disclose the report or identity of the Whistleblower to the CIC, Senior Management or members of the Board if they are suspected of being involved in the Reportable Misconduct.

The Regional Head, Internal Audit cannot disclose the identity of the Whistleblower to any third party other than the Malaysian Anti-Corruption Commission (MACC), Bursa Malaysia Securities Berhad, Securities Commission or the Malaysian Police, unless prior consent of the Whistleblower is received.

Reasonable steps should be taken by the assigned investigators to ensure that investigations regarding the complaint or report are fair and unbiased. Special care should be taken to ensure that:



Investigations will be carried out as fast as reasonably practicable and with a degree of confidentiality consistent with the seriousness of the allegations raised;



Any person who may be affected by the investigation should have the opportunity to put their case forward and to be aware of the allegations and evidence against them; and



Internal Audit will obtain specialist, independent advice on matter outside their knowledge or expertise. All Employees of TIME are required to assist the investigators to the maximum possible extent in carrying out investigations



Employees who believe they are being penalised in any way for Whistleblowing or who believe that there have been cover up of the action disclosed or who do not consider that they have had a satisfactory response to their disclosure should write to the Chairman of the Audit Committee with the facts.

All detailed records of all the evidence gathered, interviews conducted and all records received which affect the outcome of the investigation would be kept by the Internal Audit Division.

## 8.0 Disclosure

It will generally be inappropriate for the Regional Head, Internal Audit or other investigators to make reports regarding progress of the investigation to anyone other than the Board of TIME and / or the Audit Committee and CIC as it could tarnish the corporate image of the Company or unfairly damage the reputation of the people who are the subject of the allegations.

In order to gather more information or obtaining feedback, Internal Audit and / or other investigators may also choose to involve the Whistleblower (if he / she has identified themselves) in the investigation.

Internal Audit or investigators could however exclude the Whistleblower from the investigation if they believe that the interests of a fair investigation or the protection of the Whistleblower are served better.

## 9.0 Reporting

The Regional Head, Internal Audit will submit the investigative reports which include all findings or evidence, to the Board of TIME Audit Committee and Senior Management of the Company.

The Internal Audit Division shall retain all records relates to all of the reported misconduct through this Whistleblowing Policy for a period of 7 years on behalf of the Audit Committee.

## 10.0 Action Plan

If the claim of malpractice or misconduct is substantiated, then the Company will undertake appropriate disciplinary action against the responsible individual(s) up to and including termination of employment. The Management of TIME will subsequently take action to prevent the misconduct from continuing or occurring in the future based on the recommendation contained in the investigation report.

This may include:

- a. terminating, withdrawing from or modifying TIME's involvement in the

project, transaction or contract identified in the report;

- b. repaying or reclaiming any improper benefit obtained;
- c. disciplining responsible personnel (which, depending on the severity of the issue, could range from a warning for a minor offence to dismissal for a serious offence);
- d. reporting the matter to the authorities; and
- e. if bribery has occurred, take action to avoid or deal with any possible consequent legal offences

Any act of retaliation or victimisation against the whistleblower will result in disciplinary action, up to and including termination of employment against the employee performing such acts. The malicious use of the Whistleblowing Policy will result in disciplinary action against the whistleblower complainant, up to and including termination of employment.

## 11.0 Unproven Misconduct

If a complaint or report of the misconduct cannot be proven from the investigation, no further action is taken at that point. However, if any new evidence is introduced subsequently, the investigation may be reopened.

## 12.0 Policy Review

TIME Whistleblower program (including this Policy) will be reviewed at least every 3 years by the Senior Management, in consultation with the Internal Audit Division.

The review should address the overall effectiveness of the Whistleblower program, by taking into account the number and the nature of complaints or reports made, the manner in which the investigations are carried out (including the associated costs to the Company), the findings of the investigations and the course of action taken, the consequences of making a complaint or report on the Whistleblower, the level of awareness and understanding of the policy among employees and the general compliance with this Whistleblowing Policy.

## APPENDIX A

### LIST OF COMPLAINTS UNDER WHISTLEBLOWING POLICY

A whistleblower complaint is information relating to improper conduct or any staff, consultant or contractor engaged by TIME. Improper conduct includes:



A failure to comply with any legal and regulatory obligations;



Miscarriage of justice;



Damage to the health and safety of any individual;



Damage to the environment;



Unlawful discrimination;



Criminal offence;



All types of harassment or bullying;



Misuse of Company information;



Acceptance of gifts / favour beyond the threshold allowed by the Company;



Corruption, involving conflict of interest in purchasing or sales schemes, bribery involving kickbacks or bid rigging, illegal gratuities or blackmail;

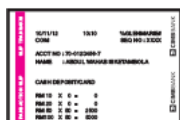


Asset misappropriation, involving theft of cash on hand or from deposits, skimming of sales, receivables, refunds including write off schemes or lapping schemes and fraudulent disbursements including billing schemes, personal purchases, payroll schemes, ghost employees, commission schemes, falsifies wages, expenses reimbursement including overstated and fictitious expenses, cheque tampering, false voids and refunds;



Asset misappropriation on inventory and other asset theft, misuse, personal use, false transfers, false sales and shipping, false purchasing and receiving;





Fraudulent Financial Statements including over or under statement of assets or revenue, fictitious revenue, false time records, concealing liabilities, improper asset valuations;



Fraudulent Non-Financial including employee credentials, internal or external documents, compliance statements; and



Breach of trust, abuse of power/ authority, forgery or alteration of any documents belonging to TIME, anti-competition behaviour, conflict of interest, breach of TIME policy, money laundering, racial discrimination, harassment, bullying & sexual misconduct, damage to the environment, insider trading and malpractices;



The deliberate concealment of information tending to show any of the matters listed above