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TECHNOFIT

INTEGRATED MANAGEMENT SYSTEM
ISO 37001:2025

WHISTLEBLOWING POLICY

TSB – IMSM – 003
ISSUE 1
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Provision of Engineering, Procurement, Construction, Commission for Mechanical, Electrical, Civil and Structure.
Provision of Maintenance Repair and Overhaul for Mechanical and Electrical.

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1.0 Introduction

TECHNOFIT Sdn Bhd ("Company") is committed to promoting and maintaining the highest standards of integrity, accountability, and transparency at its workplace as well in the conduct of its businesses and operations.

The purpose of this Whistleblowing Policy is to facilitate the earliest possible disclosure by the employees or third parties in a responsible and appropriate manner about possible improprieties without fear of reprisals or detrimental actions against the individuals concerned.

2.0 Declaration of Board of Directors

The Board of Directors unconditionally declares that it:

a. is against any form of improprieties in matters of financial reporting, compliance and other malpractices;
b. encourages employees at all levels and stakeholders to raise matters of concern (Whistleblower); and
c. will deal with and follow up on such matters with due safeguard for the protection and interests of the Whistleblower.

3.0 Objective of the Whistleblowing Policy

This policy applies to TECHNOFIT Sdn Bhd. The purpose of this policy is to:

a. to provide clear and transparent procedures for individuals to report any cases of suspected and/or known misconduct, wrongdoing, corruption, fraud, abuse or breach of legal obligation. Such breach of legal obligation includes negligence, breach of contract, danger to health and environment and/or cover up of such happenings in the workplace.
b. ensure whistleblower can raise concerns without fear of suffering retribution and safeguard such person's confidentiality; and
c. provide a transparent and confidential process for dealing with concerns.

4.0 Coverage of Whistleblowing Policy

This policy covers the following matters of concern, including but not limited to:

a. criminal offences, unlawful acts, fraud, corruption, bribery and blackmail;
b. unsafe work practices or negligence in carrying out work obligations;
c. misappropriation or unauthorized use of the Company's resources;
d. discrimination of race, religion and gender;
e. involvement in a conflict-of-interest situations; and
f. concealing any of the above.

5.0 Safeguards of Whistleblowers

TECHNOFIT Sdn Bhd is committed to the following safeguards:

a. protect and respect the rights of any whistleblower who raises matters of concern under this policy in good faith;
b. will not tolerate any reprisals, discrimination, harassment, intimidation or victimization of anyone raising a genuine concern or that person's colleagues or relatives;
c. will take reasonable steps so that any whistleblower making a disclosure will retain their anonymity unless they agree otherwise or unless otherwise required by law; and
d. will ensure no one will be at risk of suffering some form of retribution as a result of raising a concern even if they are genuinely mistaken.

Anonymous disclosures shall be entertained; however, the Governing Body reserves the right to decide whether to initiate an investigation-based adequacy of the initial evidence provided.

It must be clear that for an anonymous report to be investigated, it must contain sufficient evidence to form a reasonable basis for investigation. It must also be appreciated that following a successful investigation, a statement by the person reporting the concern may be requested to enable appropriate action to be taken to address that concern. It must also be clear that the above safeguards are not extended to anyone who maliciously raises a matter they know are totally untrue.

6.0 Reporting Procedure

Matters of concern may be made orally or in writing as soon as possible. People who raise the concern are to note the following procedures:

a. Information to be provided are:

- Name of whistleblower
- Contact details
- Details of person(s) involved
- Nature of the concern and the background and history of the concern with relevant dates, time and venue;
- Provide evidence, if any together with the report
- Is the concern previously raised with anyone else before, and if so, with whom; and

b. The Whistleblowing Unit shall consist of representatives from the Board Chairman, Coporate Service, QAQC Department. Whistleblowers are encouraged to submit their reports using the Whistleblowing Form through one of the following confidential channels:

Channel for receiving concerns:

i. Email
Submit the completed form and supporting documents via the dedicated whistleblowing email:
whistleblowing@technofit.com.my

ii. Mail
Employees and third parties may report issues anonymously by sending a letter marked “Private & Confidential” by post, addressed to the **General Manager Coporate Service**. The mailing address is as shown below:

TECHNOFIT Sdn Bhd., No. 2 & 3, Jln PPS 1, Pusat Perdagangan Selaseh, 68100 Batu Caves, Selangor

7.0 Consequence of Misconduct

The Company takes all reports of misconduct seriously. If investigations substantiate the allegations, appropriate disciplinary or legal actions will be taken, which may include:

a. Dismissal or termination of employment
b. Reporting to law enforcement authorities
c. Other measures deemed appropriate by Management or the Board

8.0 Investigation Process

a. **Initial Assessment** – The Whistleblowing Unit will assess the report received from the Whistleblower and determine whether the concern raised constitutes any wrongdoings as defined in this Policy. Additional information may be requested from the Whistleblower. The initial assessment will be conducted within **seven (7) working days** from the date the report is received. If the case is closed, the Whistleblowing Unit will inform the Whistleblower on the decision.

b. Internal Investigation – If the Whistleblowing Unit is satisfied with the information of the case based on an initial assessment, he/she may form investigation team or an external independent party to carry out an investigation on the concerns raised by the Whistleblower. During the period of investigation, the accused wrongdoer may temporarily be reassigned to other department/ function or asked to take leave, pending the outcome of the investigation. The investigation shall be completed within **thirty (30) to sixty (60) days**, unless the complexity of the case requires an extension, in which case the Whistleblower will be informed. An investigation report and accompanying recommendations shall be submitted to the Top Management and Governing Body to decide on any consequential action.

c. Communicating with Whistleblower – The Whistleblowing Unit shall inform the Whistleblower of the outcome of the investigation. However, the details of the findings will not be disclosed due to confidentiality.

d. Follow-up Actions – If the alleged wrongdoer is found to have committed the alleged misconduct, the Anti-Bribery Function will recommend appropriate actions to be taken against the wrongdoer, including but not limited to, employment termination or reporting the case to the police or other relevant authorities.

e. When forming an Internal investigation team, the Whistleblowing Unit shall ensure that the team meets the following criteria:

i. Independence
- Members must not have any personal, professional, or financial interest in the case.
- Members shall not be from the same department or reporting line as the accused wrongdoer, where possible.

ii. Competence and Expertise
- Members shall possess the necessary knowledge, skills, and experience relevant to the nature of the allegation (e.g., HR, compliance, finance, audit, legal, operations).
- Each member of the investigation team shall have attended investigation or misconduct investigation training.

iii. Impartiality and Objectivity
- Members must demonstrate fairness, neutrality, and the ability to conduct investigations without bias.
- Members must be able to assess facts based solely on evidence.

iv. Confidentiality
- Members must be capable of maintaining strict confidentiality of all information related to the investigation.

v. Integrity and Ethical Conduct
- Members must have a strong track record of integrity and compliance with company policies, including the Anti-Bribery (AB) Policies.

vi. Availability and Commitment
- Members must be available to participate promptly and actively in the investigation process.
- Members must commit to completing the investigation within the timeframe determined by Whistleblowing Unit, unless extended for justified reasons.

vii. External Independent Party (if applicable)
- Where expertise is not available internally, or where higher impartiality is required, Whistleblowing Unit may appoint an external independent party.

- The external party must be a qualified professional body or firm experienced in conducting internal investigations.

9.0 Internal Investigation and Follow Up

a. The company will respect and protect the confidentiality of the Whistleblower; and hereby gives the assurance that it will not reveal the identity of the Whistleblower to any third party or other employees and anyone not involved in the investigation or prosecution of the matter unless he or she agrees otherwise. Where concern 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 proceed.

b. The only exception to this assurance relates to any overriding legal obligation to breach confidentiality. The Company is also obligated to reveal confidential information relating to a whistleblowing report if ordered to do so by a court of law.

c. The Company’s assurance of confidentiality can only be completely effective if the Whistleblower, likewise, maintains confidentiality.

10.0 Application Of The Whistleblower Protection Act

a. In June 2010, the Whistleblower Protection Act 2010 (“the Act”) was passed by Parliament and came into force on 15th December 2010. The Act protects persons making disclosures of improper conduct in the public and private sector from civil and criminal action. In addition, the Act allows for proper investigation to be carried out by an enforcement agency set up by the Federal Government, State Government or local government (“Enforcement Agency”).

b. If an Employee wishes to make a disclosure or report of improper conduct by any Employee pursuant to the Act, then the reporting Employee will have to make the said disclosure of improper conduct to an Enforcement Agency. Any investigations and/or actions taken thereafter would be in accordance with the Act and are independent of the procedures described in this Policy.

c. The Company respects the right of Employees to report improper conduct directly to an enforcement agency. However, Employees are encouraged to report concerns through the Company's internal reporting channels where appropriate, so that the Company may investigate, remedy the matter, and implement suitable corrective or preventive controls.

11.0 Review Of Policy

This policy will be reviewed at least once every three (3) years or as necessary to ensure continued relevance, compliance with laws, and alignment with the Group's governance standards.

12.0 References

This Policy should be read in conjunction with the Anti-Bribery and Anti-Corruption Policy and Guidelines, and other relevant internal policies. For clarification, contact the Whistleblowing Unit.

Appendix 1: Whistleblowing Form 1/3

TECHNOFIT

WHISTLEBLOWING FORM

A. PARTICULARS OF WHISTLEBLOWER		
Name		
Designation		
Division / Company		
Contact No.		
Email		
Relationship with TECHNOFIT Sdn. Bhd. (e.g. employee, supplier, client)		
B.	**DISCLOSURE DETAILS**	
1	**PARTY INVOLVED IN THE CONCERN RAISED** (You may insert information on additional individuals involved in a separate sheet)	
ALLEGED PERSON 1		
a.	Name	
b.	Designation	
c.	Division/Company	
d.	How do you know this person?	
ALLEGED PERSON 2		
a.	Name	
b.	Designation	
c.	Division/Company	
d.	How do you know this person?	
2.	**DETAILS OF CONCERN** (You may use additional sheets if necessary)	
a.	Type of concern (Tick whichever is applicable)	○ Fraud / Dishonesty / Breach of Trust ○ Bribery / Corruption ○ Abuse of power ○ False Claim ○ Conflict of interest ○ Theft / Embezzlement ○ Misuse of the Company property ○ Non-compliance with the Company code of conduct, policies and procedures ○ Facilitation payments ○ Insider trading ○ Others, please specify: ___________________________________
b.	Incident date & time	
c.	Location of Incident	

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Appendix 1: Whistleblowing Form 2/3

TECHNOFIT
WHISTLEBLOWING FORM

d.	Description of Incident / Concern	
3.	**SUPPORTING INFORMATION TO ASSIST INVESTIGATION** (Please attach supporting evidence to substantiate your disclosure and assist in the investigation. You may use additional sheets for additional witnesses or supporting evidence if necessary)	
WITNESS 1		
a.	Name	
b.	Designation	
c.	Division/Company	
d.	Supporting Evidence/ Document	
WITNESS 2		
a.	Name	
b.	Designation	
c.	Division/Company	
d.	Supporting Evidence / Document	

C. ADDITIONAL DETAILS	
Have you lodged a complaint on this matter to another person / department / authority before?	☐ Yes ☐ No
If **YES**, please indicate the person / department / authority that the report was lodged:	

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Appendix 1: Whistleblowing Form 3/3

TECHNOFIT

WHISTLEBLOWING FORM

D. DECLARATION
Pursuant to this report, I hereby declare the following: • I acknowledge and declare that all information provided in this form is true, correct and complete to the best of my knowledge, information and belief • I am willing to assist in the investigation of improper conduct (if required) • Prior to this report, I have not disclosed the subject matter of the complaint or any part thereof to any other person • I am aware that it is an offence to provide false information/allegation with intention to disgrace the employee or company's image and reputation and/or misuse the mechanism of whistleblowers system and disciplinary action could be taken against me …………………………………………… (Signature) Name: Date:

E.	**WHISTLEBLOWING UNIT ACKNOWLEDGEMENT**	
a.	Signature	
b.	Name	
c.	Designation	
d.	Date & time received	
e.	Register Report No	

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