

### Policy Statement

PayNet Group (“PayNet”) is committed to complying with the laws and regulations by which it is governed, as well as other applicable laws and regulations. An integral component to this commitment is abiding to the procedures set forth in PayNet Group’s Whistle-Blowing Policy (“Policy”).

Our values are a shared understanding of what we stand for and how we do things. They underpin our culture and provide a foundation for decision making. We never compromise our values, under any situation. We aspire to conduct our affairs in an ethical, responsible, and transparent manner, recognising the value of transparency and accountability in our administrative and management practices as well as support the making of disclosure that reveals wrongdoing or improper conduct or mismanagement of our resources. Any other rules, procedures, guidelines, circulars, standards, codes, notices, and directives issued by governing authorities from time to time.

### Objective

This Policy is to provide an avenue for all employees of PayNet and/or the public to disclose any improper conduct in accordance with the procedures as described under this Policy and to provide protection for employees who report such allegations.

### Scope

This Policy covers all employees and all matters involving PayNet employees and any other person providing services to or receiving services from PayNet. This Policy is not to replace PayNet’s existing policies and procedures for handling employee grievances or similar complaints, which will continue to be administered by the Human Capital Management Department under the Disciplinary Procedure.

### Form of Reporting

A disclosure of wrongdoing or improper conduct may be made in writing via a letter or e-mail. If a Whistle-blower chooses to make a report under this Policy by way of e-mail, the e-mail can be directed to the following e-mail addresses:

- a) Head of Integrity - [headofintegrity@paynet.my](mailto:headofintegrity@paynet.my)
- b) Director of Internal Audit Division
- c) Director of Risk and Compliance
- d) Group Chief Executive Officer
- e) Chairman of the Group Audit Committee
  - [auditchairman@paynet.my](mailto:auditchairman@paynet.my)
  - [paynet.audit.chairman@gmail.com](mailto:paynet.audit.chairman@gmail.com)

A report made via letter can be delivered either by hand or by post to the Director of Internal Audit Division, Director of Risk & Compliance, Group Chief Executive Officer or the Chairman of the Group Audit Committee and must be sealed and labeled “PRIVATE AND CONFIDENTIAL – TO BE OPENED BY ADDRESSEE ONLY”.

### Types of Wrongdoing

Employees can lodge a whistle-blowing disclosure if they are aware of any misconduct/wrongdoing, including, but not limited to the following:

- a) Unlawful activities such as bribery, corruption, fraud, embezzlement, abetting, abuse of power, reporting fraudulent financial information, misrepresentation;
- b) Harassment of any form;
- c) Violation of PayNet Vendor Code of Conduct;
- d) Conduct which is or will lead to a regulatory breach;
- e) Any other conduct which may cause loss to PayNet, risk PayNet’s reputation or otherwise be detrimental to the interests of PayNet;
- f) Any attempt to conceal or suppress information relating to the above matters; and/or
- g) Encouraging, instigating, allowing, coercing or influencing any employee or anyone to do any of the above.

### Protection of Whistle-blower

A whistle-blower shall, upon receipt of the disclosure of improper conduct, be conferred with whistle-blower protection under this Policy as follows:

- a) Protection of identity; and
- b) Protection against retaliation and detrimental action. The whistle-blower protection is not limited or affected in the event that the disclosure of improper conduct does not lead to any disciplinary action or prosecution of the person against whom the disclosure has been made. This is provided the whistle-blower has acted in good faith and has reasonable grounds for believing or suspecting that there was a wrongdoing within PayNet when making the disclosure. The protection will be revoked if the whistle-blower is believed to have committed any actions under Clause 11.2 of the Policy

### Reporting Anonymity

Anonymous reporting is allowed. However, anonymous complaints are discouraged, as it may be more difficult for PayNet to investigate and to obtain the necessary clarification and/or evidence on these complaints. Complaints made anonymously may also result in the forfeiture of the rights and protections afforded to the Whistle-blower in the Policy.