

# Whistleblowing Policy

## Policy Statement

PayNet is committed to full compliance with applicable laws and regulations, including adherence to the PayNet's Whistleblowing Policy. Our values define our culture and guide our decision – we never compromise them. We uphold ethical, responsible, and transparent practices, recognizing the importance of accountability and disclosures that expose wrongdoing or mismanagement.

## Objective of the Policy

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

## Scope of the Policy

This Policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include, but are not limited to the following:

- a) Bribery, corruption, fraud, embezzlement, abuse of power, or misrepresentation;
- b) Misuse of PayNet's Property and Information;
- c) Any form of harassment;
- d) Violation of PayNet's policy;
- e) Actions leading to regulatory breaches;
- f) Conduct risking loss, reputational harm, or detriment to PayNet;
- g) Concealing information relating to misconduct;
- h) Encouraging or coercing others to commit any of the above

This policy is not to invalidate the Grievance Procedure and/or the Disciplinary Procedure but to provide more avenues for employees and members of the public to disclose improper conduct committed or about to be committed to the Company. The given procedures as reflected in the Employee Handbook and PayNet's existing policies and procedures shall be operative based on the purpose and objective of their existence.

## Form of Reporting

A disclosure of wrongdoing or improper conduct may be made via the following channels:

1. Online Whistleblowing Platform
  - Submit a report securely via <https://paynet.whispli.com/>
2. E-mail
  - Head of Integrity: [headofintegrity@paynet.my](mailto:headofintegrity@paynet.my)
  - Chairman of the Group Audit Committee: [paynet.audit.chairman@gmail.com](mailto:paynet.audit.chairman@gmail.com)
3. Letter
  - Reports can be delivered by hand or post to the Head of Integrity or the Chairman of the Group Audit Committee
  - Must be sealed and labeled "PRIVATE AND CONFIDENTIAL – TO BE OPENED BY ADDRESSEE ONLY"

## Whistleblower Protection

A whistleblower is protected under this Policy through identity confidentiality and protection against retaliation, regardless of whether the disclosure leads to disciplinary action or prosecution. This protection applies if the whistleblower acts in good faith with reasonable grounds to suspect wrongdoing within PayNet. However, it will be revoked if the whistleblower is found to have engaged in misconduct as stipulated under the scope of this Policy.

## Anonymous Whistleblower

Any employee or member of the public who wishes to report improper conduct may remain anonymous.

## Notification

When you report a concern, you can expect that your report will be treated seriously, fairly and promptly. You may expect updates during and upon completion of our investigation, unless we take the view that disclosure may impede investigation.

***PayNet reserves the right to amend this policy from time to time.***