



Whistleblowing Policy



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1.0 Purpose

This policy is to ensure high standards of corporate governance, business integrity and accountability in conduct of its business and operations.

2.0 Scope

This policy applies to all members of EDELTEQ, namely:

- Board of Directors
- Management and employees of EDELTEQ

This Policy does not replace or affect the Company's Code of Conduct or other policies and procedures established or to be established by the Company from time to time.

3.0 Whistleblowing Procedures

1. For allegation of misconduct or corrupt practices, please report to the company management through the following channels :

3.1.1 Reporting Channels

Postal : Attention – Ethics Compliance Officer
No. 18, 20 & 22, Lorong Impian Ria 4,
Taman Impian Ria,
14000 Bukit Mertajam,
Pulau Pinang.

Email: whistleblowing@edeltech.com

To enable the company to effectively investigate your concerns, the following information should be provided, where possible:

- 3.1.2 Your contact information;
- 3.1.3 Name of the person involved;
- 3.1.4 Your relationship with the reported person;
- 3.1.5 Detailed description of the incident (including date, time, location, action and etc);
- 3.1.6 Has management been informed (if yes, please provide additional detail);
- 3.1.7 Physical evidence and any other information that may substantiate the incident.

We encourage whistleblowers to provide their names and contact numbers to facilitate investigations.



2. Whistleblowers will be protected from any harassment, persecution, or discriminatory behaviour. Moreover, all verbal or written communication and/or e-mail will be dealt with confidentially unless it is absolutely necessary to share such information in order to address the matter appropriately.
3. Failure to report known or suspected wrongdoing, in connection with the Company's business, of which an associate or agent of the Company has knowledge, may, in itself, subject that individual or entity to disciplinary action, including prosecution under the anti-bribery laws of the applicable jurisdiction.

4.0 Reporting Procedures

1. Upon receiving a Whistleblower report, the ethics compliance officer shall review and evaluate the Whistleblower's disclosure and decide on the next course as soon as possible.
2. If the allegation is on any Employee, he or she shall automatically be recused from participating in the investigation and decision-making process pertaining to the allegation.
3. An independent Domestic Inquiry team shall be setup to conduct a preliminary investigation to determine the severity of the Whistleblower's report on the alleged misconduct. The Domestic Enquiry Team shall set a timeframe for the preliminary investigation to be completed.
4. If the preliminary investigation report concludes that the alleged misconduct is:
 - a) Proven unfounded or cannot be substantiated, no further action required and the case shall be deemed closed;
 - b) Justified and serious, the case shall be further discussed with the top management team and/or board of director for next course of action.
The Ethics compliance officer shall inform the Whistleblower of the decision made and actions taken or to be taken within two weeks of receiving his other report.
5. The Whistleblower shall be reminded NOT TO :
 - (a) contact the suspected Employee to determine facts or demand restitution.
 - (b) discuss the case or allegations with anyone except with the Domestic Inquiry Team.