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ALLO TECHNOLOGY SDN. BHD.

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**TITLE:
WHISTLEBLOWING POLICY**

Document Number:

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N/A	Development of policy	Trident Integrity Solutions Sdn Bhd		

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1. Background

In line with the practice of integrity and good corporate governance, Allo wishes to ensure that internal and external parties working with the company have an avenue to raise concerns about potential improprieties in business conduct in a secure and confidential manner.

The Whistleblowing Policy and Procedure therefore aims to provide a platform and internal mechanism for both Allo Personnel and external parties to report information relating to malpractice, misconduct, illegal activities and omissions that are against the rules of the company, industry regulations and legal requirements which may be committed by Allo Personnel.

2. Objective

2.1 The policy aims to:

- a) Encourage and enable persons to report, in good faith or on the basis of a reasonable belief, any attempted, suspected and actual malpractice in relation to the operation and management of Allo, through the allocated channels, in confidence and without fear of retaliation;
- b) Notify the Integrity Officer of potential improvements to make to the anti-bribery programme;
- c) Build and strengthen a culture of transparency and trust both within the organisation and with external stakeholders.

3. Scope

3.1 This policy is applicable to:

- a) Allo, the BOD and Allo Personnel, and the BODs and personnel of Business Associates when they are acting on Allo's behalf.
- b) Allo external providers (suppliers, consultants, contractors etc.)
- c) Allo customers
- d) Other Allo stakeholders

3.2 The Whistleblowing Policy covers possible and actual malpractice in relation to the operation and management of Allo. Examples include:

- a) Bribery
- b) Fraud
- c) Theft or embezzlement
- d) Conflict of interest
- e) Corruption (abuse of power)
- f) Criminal offences
- g) Failure to comply with the rules, instructions and procedures of Allo
- h) Failure to comply with legal or regulatory obligations
- i) Misuse of Allo property
- j) Miscarriage of justice
- k) Endangering the health and safety of an individual
- l) Endangering the environment
- m) Concealment of any of the above

4. References

TNB Documents:

- a) TNB Anti-Bribery Policy
- b) TNB Code of Ethics
- c) Board Integrity Committee Terms of Reference
- d) Integrity Steering Committee Terms of Reference

Allo Documents:

- a) Anti-Bribery Policy
- b) Allo Code of Business Ethics
- c) Allo Code of Conduct
- d) Malaysian Anti-Corruption Commission (MACC) Act 2009

5. Definitions

The following definitions are included in this policy.

Allo Personnel	All individuals directly contracted to the company on an employment basis, including permanent and temporary employees.
BOD	The Board of Directors of Allo
Bribery	<p>Bribery is defined as any action which would be considered as an offence of giving or receiving 'gratification' under the Malaysian Anti-Corruption Commission Act 2009 (MACCA).</p> <p>In practice, this means offering, giving, receiving or soliciting something of value in an attempt to illicitly influence the decisions or actions of a person a position of trust within an organisation.</p> <p>'Gratification' is defined in the MACCA to mean the following:</p> <ol style="list-style-type: none"> 1. <i>money, donation, gift, loan, fee, reward, valuable security, property or interest in property being property of any description whether movable or immovable, financial benefit, or any other similar advantage;</i> 2. <i>any office, dignity, employment, contract of employment or services, and agreement to give employment or render services in any capacity;</i> 3. <i>any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;</i> 4. <i>any valuable consideration of any kind, any discount, commission, rebate, bonus, deduction or percentage;</i> 5. <i>any forbearance to demand any money or money's worth or valuable thing;</i> 6. <i>any other service or favour of any description, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted, and including the exercise or the forbearance from the exercise of any right or any official power or duty; and</i> 7. <i>any offer, undertaking or promise, whether conditional or unconditional, of any gratification within the meaning of any of the preceding paragraphs (a) to (f).</i> <p>Bribery may be 'outbound', where someone acting on behalf of Allo attempts to influence the actions of someone external, such as a Government official or client decision-maker.</p>

	It may also be 'inbound', where an external party is attempting to influence someone within the Allo such as a senior decision-maker or someone with access to confidential information.
Corporate Gift	Something given from one organisation to another, with the representatives of each organisation giving and accepting the gift. Corporate gifts may also be promotional items given out equally to the general public at events, trade shows and exhibitions as a part of building the company's brand. The gifts are given transparently and openly. Corporate gifts normally bear the company name and logo. Examples of corporate gifts include items such as diaries, table calendars, pens, notepads, plaques, and festive gifts such as hampers, oranges and dates. See also <i>Personal Gift</i> below.
Corruption	The Transparency International definition is used for the TCIMS: 'The abuse of entrusted power for personal gain.' See the definition for 'bribery', which is the term used primarily in the TCIMS.
LRD	Legal and Regulatory Department
MACC	Malaysian Anti-Corruption Commission
PDRM	Royal Malaysia Police (Polis Diraja Malaysia)
Personal Gift	Something given from one individual to another, with the intention of creating or enhancing a personal relationship. The gifts are given in a private setting, without the knowledge or approval of the company management of one or both parties. Personal gifts may include cash, cash equivalents such as credit cards, bitcoin or savings accounts, electronic items, watches, luxury pens, property, vehicles, free fares, shares, interest free loans, lottery tickets, travel facilities, entertainment, services, club memberships, any forms of discount or commission, jewelleries, decorations, souvenirs, vouchers or any other valuable items. See also <i>Corporate Gift</i> above.
Retaliation	One or more of the following: <ol style="list-style-type: none"> 1. Interference with the lawful employment or livelihood of a person, including discrimination, discharge, demotion, suspension, disadvantage, termination or adverse treatment in relation to the complainant's employment, career, profession, trade or business or the taking of disciplinary action. 2. Withholding of payment that is due and payable under a contract. 3. Refusal to enter into a subsequent contract. 4. Action causing injury, loss or damage. 5. Intimidation or harassment. 6. A threat to take any of the actions above.
Stakeholders	Individuals or groups concerned with, or affected by company policy and practice, including, but not limited to, personnel, customers, government bodies and parties, investors, joint venture partners, communities where Allo has interests, suppliers, contractors
TCIMS	TNB Corporate Integrity Management System
Whistleblower	A person who discloses information on a person or organization engaged in or suspected of being involved in malpractice.

Whistleblowing	Disclosure by a person, usually company personnel, to those within the company in a position of authority and/or appointed to receive such disclosures, or a Government authority, or the media, of attempted, suspected and actual malpractice.
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6. Policy owner

The LRD is the owner of this policy.

7. Policy

7.1 Making a report

- a) Allo shall make provision for the reporting of bribery and other forms of misconduct through designated secure channels, available to both internal and external parties.
- b) Allo Personnel may wish to report their concerns to the Integrity Officer or Human Resource Department (HRD). In such a case, where the report can be substantiated or the matter is of a serious nature, the person receiving the information should recommend the discloser lodge a report through the following channels:
 - i. Whistleblowing Form (*available on the website and intranet*)
 - ii. Director of Allo:

Name: Dr. Ir. Ahmad Jaafar Bin Abd Hamid
 Designation: Head of Subsidiary Management Department (TNB SMD)
 Email : ajah@tnb.com.my
 - iii. Walk-in to meet the Integrity Officer (working hours only)
 - iv. Phone calls : Integrity Officer at 03-88005222 (working hours only)
 - v. Email : *integrity@allo.my*
 - vi. Letter : *Integrity Officer of Allo Technology Sdn. Bhd.
 Cyberview Garden Villas, Persiaran Multimedia,
 Cyber 7, 63000, Cyberjaya, Selangor.*
- c) Allo Personnel should utilise the internal reporting channels established by Allo to lodge reports regarding issues they are concerned about. However, Allo recognises that on occasion there may be an exceptionally serious issue which warrants reporting to an external body. If there is sufficient evidence that a corruption incident has occurred, the discloser may report the incident directly to the Government authorities such as the MACC or PDRM to secure official discloser protection. This disclosure must be made in good faith, not malicious, and not made for the purpose of personal gain.
- d) Reports may be lodged in Bahasa Malaysia (BM) or English. Reports submitted in other languages may be translated by Integrity Officer for processing.
- e) The company allows but discourages reports from anonymous sources. Disclosers are expected to provide their personal information, including name, contact phone number and/or e-mail to allow for follow-up, obtain further information if necessary and keep the discloser informed.
- f) All concerns raised via the whistleblowing channels shall be assessed, managed and investigated in a fair and proper manner.
- g) Allo may decide to close cases which lack material evidence, particularly where the report originates from an anonymous source and further information cannot be obtained.

7.2 Protection of anonymity

- a) The identity of all disclosers shall be protected by all means possible.
- b) The Whistleblowing Committee/team and its members shall not disclose the identity of a whistleblower who:
 - i. makes a report of any nature within the provisions of this Policy; or
 - ii. asks that his identity as the person who made such report remains confidential, unless judicial or other legal processes require such disclosures. The whistleblower shall be informed accordingly.
- c) Only the following are authorised to access full details (including information on discloser's identity) of the discloser reports:
 - i. TNB CEO or Director of Allo or Chief Integrity Officer (CIDO) of TNB
 - ii. Integrity Officer
- d) In the event that the report makes reference to any of the above persons, the implicated person shall not have access to the report. In this instance or where otherwise necessary, TNB ID shall be engaged to handle the issue.
- e) Unless the discloser agrees otherwise in writing, all further reports will exclude personal details of the discloser. If it is necessary to include reference to the discloser, a pseudonym unrelated to the discloser, must be used. E.g. 'Mr X' or 'Ms M'.
- f) Anyone who reveals the identity of a discloser without prior agreement from the discloser will be subject to disciplinary measures, including, but not limited to, the termination of contract or removal of directorship. The exception is where the information is demanded by a Government enforcement body or similar authority under the conditions of a warrant.

7.3 Assurances and protection against retaliation

- a) The discloser shall receive no retaliation for a report that was provided in good faith, i.e., was not done primarily with malice to damage another person or the organisation. Such protection is accorded even if the investigation later revealed that the whistleblower is mistaken regarding the facts, rules and procedures involved.
- b) Anyone who retaliates against a discloser will be subjected to disciplinary action, which may include termination of employment, demotion, or other legal redress.
- c) A discloser or any person related to, or associated with, the discloser, who fears, or has suffered detrimental action as a result of their whistleblowing action may:
 - i. Report the incident(s) to the HRD;
 - ii. Request for transfer of employment to another department. The request should be made in writing to the HRD.
- d) Provided the request is reasonable, the CEO shall authorise the transfer at the earliest opportunity.

7.4 Receiving a whistleblower report

- a) No personal details of the discloser must be revealed in any report, unless prior written permission is given by the discloser. If it is necessary to include reference to the discloser, a pseudonym unrelated to the discloser must be used. E.g., 'Mr X' or 'Ms M'.
- b) Reports may be provided to the following Allo parties:

- i. Initial Assessment Committee (IAC);
 - ii. Case Determination Committee (CDC);
 - iii. Personnel involved in disciplinary hearing proceedings related to the case; and
 - iv. Any other party agreed with prior written approval by the Head of CDC.
- c) Reports are only to be compiled and checked by the Integrity Officer prior to printing and distribution to ensure no personal details are revealed.
- d) Reports to the Government authorities are to be made by the Domestic Inquiry Team, advised by the CDC. See the *Investigation process* section below.
- e) The CDC shall decide whether or not to forward reports received to the Government authorities. Reports which include the items below should be submitted:
 - i. Material evidence of an incident of bribery or corruption;
 - ii. Specific details of the transaction(s);
 - iii. Names of specific individuals; and
 - iv. Other information considered substantial by the Integrity Officer.
- f) The Domestic Inquiry Team will report to the Government authorities upon advice from the CDC. All such reporting must be done at the earliest opportunity once the materiality of the case is proven.
- g) The Director may also choose to forward unsubstantiated reports to the authorities.

7.5 Investigation process

- a) All the whistleblowing reports received will be channelled to the Integrity Officer for processing with the Director of Allo as stated under 7.1(ii) being notified. If it involves CEO or any of the Allo directors, it will be channelled to the TNB Chief Executive Officer (TNB CEO) for further action.
- b) For the reports that does not involve any Allo directors, the Initial Assessment Committee (IAC) will decide the next step based on the guidelines. The Investigation Team will then proceed to investigate the report if further investigation is needed.
- c) The Case Determination Committee (CDC) will decide the next step upon the report of the investigation outcome by the Investigation Team. If it needs further action, it will be channelled to the Domestic Inquiry Team.
- d) Once sufficient information has been secured through an Allo investigation showing that a corruption incident occurred, the Domestic Inquiry Team should report the matter to the Government authority and/or conduct a Domestic Inquiry. The Allo Domestic Inquiry should be conducted separately from any Government authority investigation. They will then notify the Integrity Officer at the end of the process to update the complainant and the CIDO on the report.

7.6 Providing updates to the relevant parties

Where the contact details of the discloser are provided, the Integrity Officer shall update the discloser on the progress of the case from time to time. The report will also be sent to the CIDO at the end of the investigation.

7.7 Information storage

- a) All electronically stored information must be password protected with access restricted on a strictly need-to-know basis.

- b) All hard copies must be stored in a secure location with access restricted on a strictly need-to-know basis.
- c) Only the Integrity Officer, a Director of Allo, TNB CEO and CIDO shall have access to information containing the details of the discloser.

7.8 Further information

Further information, including advice on what to do if faced with a concern or situation which could involve malpractice, can be obtained by contacting Integrity Officer, or from relevant pages on the intranet (for Allo Personnel), or the company website (for external parties).

8. Precedence of policy

With respect to the protection of the identity of the discloser, this Whistleblowing Policy shall take precedence over previous policies, terms of reference and other Allo documentation which would otherwise entitle Allo Personnel and BOD access to this information.

9. Sanctions for non-compliance

Allo takes whistleblowing seriously and will apply sanctions in the event of violations of this policy. For Allo Personnel, non-compliance may lead to disciplinary action, up to and including termination of employment. Further legal action may also be taken in the event that Allo's interests have been harmed by the results on non-compliance by individuals and organisations.

9.1 False or malicious reports

The company will take disciplinary action against any discloser who knowingly makes a false report. Disciplinary actions may include termination of employment, demotion, or other legal redress.

9.2 Obstruction of Investigation

Any person who obstructs an investigation of a whistleblowing report shall be subject to disciplinary action, which may include termination of employment, demotion, or other legal redress.

10. Waiver

Any deviation or waiver from this policy must be approved by BOD.

11. Review & Inspection

11.1 A summary of any whistleblowing incidents and their outcomes will be reported to the Allo Board and TNB ID on a quarterly basis.

11.2 The Integrity Officer will review the suitability of this policy from time to time, subject to TNB's instruction.