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SAN IMAGING SOLUTION SDN BHD

Company No. : 201401038416 (1114564-W)

**WHISTLEBLOWING
POLICY
&
PROCEDURES**

SAN IMAGING SOLUTION SDN BHD
(Registration No. 201401038416 (1114564-W))
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY

San Imaging Solution Sdn Bhd is committed to promote and maintain a high standard of transparency, accountability and ethics as well as good practices in the workplace. Whistleblowing is an act of voluntary disclosure/reporting to the Management of San Imaging Solution Sdn Bhd for further action of any wrongdoings committed or about to be committed by an employee.

OBJECTIVE OF THE POLICY

The objective of the Whistleblower Policy is to:

1. Provide an avenue for all employees and members of the public to disclose any improper conduct or any action that is or could be harmful to the reputation of San Imaging Solution Sdn Bhd and/or compromise the interest of stakeholders;
2. Provide proper internal reporting channel to make a disclosure to disclose any improper or unlawful conduct in accordance with the procedures as provided for under this policy;
3. Address a disclosure in an appropriate and timely manner;
4. Provide protection for the whistleblower from reprisal as a direct consequence of making a disclosure and to safeguard such person's confidentiality; and
5. Treat both the whistleblower and the alleged wrongdoer fairly.

TYPES OF WRONGDOING

Parties can report a whistleblowing complaint if they are aware of any wrongdoing, including, but not limited to the following:

1. Fraud, corruption or forgery;
2. Misappropriation of fund or assets;
3. Criminal activities;
4. Sexual harassment;
5. Misuse of confidential information;
6. Conflict of interest;
7. Damage to the environment;
8. Danger to health and safety of any individual;
9. Theft or insider trading; or
10. The deliberate concealment of any of the above or other acts of wrongdoing.

PROTECTION OF WHISTLE-BLOWER

The Company is committed to provide the Whistle-blower protection as stipulated in the Whistleblower Protection Act 2010. The following protection will be granted to the Whistle-blower, who make disclosure of improper conduct to the Company based on reasonable belief that misconduct is likely to happen, is committed or has been committed:

- a) Protection of confidential information
- b) Identity of Whistle-blower shall be protected, i.e., kept confidential unless otherwise required by law or for the purpose of any proceedings by or against the Company. Nevertheless, the Company shall revoke the whistle-blower protection above, if it is of the opinion based on its investigation or in the course of its investigation that, the Whistle-blower:
 - c) Has participated in the improper conduct disclosed;
 - d) Wilfully made in his disclosure of improper conduct a material statement which he knew or believed to be false or did not believe to be true;
 - e) Made the disclosure of improper conduct is frivolous or vexatious;
 - f) Made the disclosure of improper conduct principally involves questioning the merits of government policy, including policy of a public body;
 - g) Made the disclosure of improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action; or
 - h) In the course of making the disclosure or providing further information, commits an offence under the Whistle-blowing Protection Act.

WHISTLE-BLOWING PROCEDURES:

All Whistle-blower are advised to promptly report and disclose to the HR Department, if there is a reasonable belief or suspicion that a misconduct has taken place / is taking place / going to take place. Or via email to hr@sanimaging.com.

a. Report

The Whistle-blower is required to provide the following particulars in the report:

- Particulars of Whistle-blower i.e. Name, NRIC No., designation (if the Whistleblower is an employee of any Group Company) and contact particulars (email, telephone or mobile number and/or address)
- Details and description of the misconduct, including, its nature, the date, time, and place of its occurrence and the identity of the alleged person(s) involved. A disclosure may be made even if Whistle-blower is not able to identify the identity of the person(s) involved
- Particulars of witnesses, if any
- Particulars or production of documentary evidence, if any The personal details provided by the Whistle-blower will be kept confidential. The Whistle-blower may be asked to

provide further clarification and information from time to time, during the course of investigation.

b. Investigation

Investigation will be carried out by a person authorised by the Board of Directors (“Prescribe Officer”). When the Prescribe Officer receives any reported matters, shall assess if the misconduct falls within the scope of this Policy. The Prescribe Officer shall carry out investigation on the reported misconduct. The Prescribe Officer shall report the investigation results/ findings to the Board for final decision.

c. Confidentiality and Anonymity

All Whistle-blowing reports have to be made in good faith with reasonable belief that the information and allegation is true and not frivolously or maliciously and not for personal gain; otherwise, disciplinary action may be taken against an employee Whistle-blower. The Whistle-blower, Prescribe Officer or any person who is involved in the investigation process, shall not disseminate to third party’s information regarding the misconduct or any part thereof, including the status or outcome of an investigation into it.