

**ARTRONIQ BERHAD**  
**(formerly known as Plastrade Technology Berhad)**

**WHISTLEBLOWING POLICIES AND PROCEDURES**



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Company No: 200201023414/591077-X

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### **Introduction**

Artroniq Berhad ("ARTRONIQ") is committed to high standards of ethical, moral and legal business conduct and observes zero tolerance towards malpractice, impropriety, statutory non-compliance or wrongdoing by staffs. All employees, customers and suppliers ("stakeholders") are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, improper conduct or misconduct or failure to comply with regulatory requirements that is taking place/has taken place/may take place in the future.

The whistle-blowing policy of Artroniq Berhad ("the Company") is designed to:

- a) Support the company's values;
- b) Ensure stakeholders can raise concerns without fear of reprisals and safeguard such person's confidentiality;
- c) Protect a whistle-blower from reprisal as consequence of making a disclosure;
- d) Provide a transparent and confidential process for dealing with concerns.

The types of improper conduct include, but not limited to the following:

- Fraud (embezzlement, theft and misappropriation) of ARTRONIQ Group's funds or assets;
- Bribery, corruption or money laundering;
- Criminal breach of trust, abuse of power and position or blackmail;
- Improprieties and irregularities in accounting and financial reporting;
- Improper or unethical conduct or behaviour within the meaning of ARTRONIQ Group's Code of Business Conduct & Ethics or other ARTRONIQ Group's policies;
- Unauthorized disclosure or use of confidential information of ARTRONIQ Group;
- Conflict of interest within the meaning of ARTRONIQ Group's conflict of interest policy;
- Misuse of ARTRONIQ Group's properties, assets or resources;
- Non-compliance with ARTRONIQ Group's policies and procedures or breach of internal control;
- Acts or omissions which are deemed to be against the interests of the ARTRONIQ Group;
- Non-compliance with laws, regulations, requirements of statutory bodies or public policies;
- Danger to health and safety of any employee of ARTRONIQ Group or any other individual;
- Damage to the environment;
- Sexual harassment;
- An accomplice to or deliberate concealment of any or a combination of the above matters or other acts of wrongdoing;
- Unethical behaviour; and
- Other illegal acts and malpractices.

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**Principles**

The principles underpinning this Policy are as follows:

1. internal procedures to facilitate necessary whistle-blowing, on a timely and responsible manner, are in place and made known to all employees of the Company;
2. all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
3. the Company will not tolerate harassment or victimisation of anyone raising a genuine concern;
4. the identity and personal information of the whistle-blower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law;
5. the whistle-blower and the alleged wrong doer will be treated fairly. The wrong doer will be informed of the status of his allegations and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation);
6. personal information, including the identity, of the whistle-blower and the alleged wrongdoer should only be revealed on a 'need-to-know' basis; and
7. the Company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The Company, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue.

**Protection**

The identity and personal information of the whistle-blower will be protected and kept confidential, unless the whistle-blower agrees otherwise, or unless otherwise required by law.

The whistle-blower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his disclosure.

If a whistle-blower reasonably believes that he is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he may consult or report to the Audit Committee Chairman ("AC Chairman").

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**Covered Concerns**

A disclosure including but not limited to the following, shall be a serious concern to the Company:

1. corruption, bribery and fraud;
2. criminal offence or any breach of the laws of Malaysia;
3. acceptance of gifts/ favour beyond the threshold allowed by the company;
4. misuse and/or misappropriation of the company's funds or assets;
5. impropriety (including financial and operational, etc.) within the company;
6. gross mismanagement within the company (including serious potential breach to the interest of society and environment);
7. breach of code of ethics of the company, including sexual, physical or other abuse of human rights; and
8. act or omission jeopardising the health and safety of the company's employees or the public.

**Reporting Procedure**

If any stakeholder believes reasonably and in good faith that malpractices exist in the Company, the stakeholder should report this immediately to the Head-of- Department.

However, if for any reason the stakeholder is reluctant to do so, then the stakeholder should report the concerns to the AC Chairman.

Employee concerned about speaking to another member of staff can communicate, in confidence, to the AC Chairman by email. Any anonymous disclosure will not be entertained. However, the AC Chairman reserves his/her right to investigate into any anonymous disclosure.

These concerns will be managed by the AC Chairman and he/she shall have the right to decide whether to inform the Management or the Board of Directors or relevant enforcement authority(ies)(if the AC Chairman concluded that such incidents to be reported, based on the facts gathered), depending on the seriousness of the reported incident(s) and on need-to-know basis, without revealing the identity of the whistle-blower. The AC Chairman, at the cost to be borne by the Company, shall have the right and authority(ies) to decide on the next course of action and the right to engage the advice of external professionals or experts, if required.

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**Reporting Procedure (Contd.)**

Whistle-blowers' identity will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the whistle-blower raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the whistle-blower concerned as to whether and how the matter can progress further.

**Consequences of Wrongdoing or Wrongful Disclosure**

If the Person (i.e. the whistle-blower) has, or is found to have:

- committed a wrongdoing;
- taken serious risks which would likely cause a wrongdoing to be committed;
- made a disclosure not in accordance with the requirements of this policy (for instance, dishonest, mischievous or malicious complaints); or
- participated or assisted in any process pursuant to this policy otherwise than in good faith,

The corrective actions to be taken against that Person will be determined by the AC Chairman in consultation with the Managing Director or the Senior Management, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

Any attempt to retaliate, victimize or intimidate against anyone (whistle-blower) making report in good faith is a serious violation of the Policy and shall be dealt with serious disciplinary actions and procedures.

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**Administration**

This Policy is administered by the Company Secretary with the assistance of the Management and overseen by the Board of Directors.

Contact persons: -

Audit Committee Chairman: Mr Tan Tian Wooi

Email: [tantw12@gmail.com](mailto:tantw12@gmail.com)

**-END OF POLICY -**