



ELSOFT RESEARCH BERHAD

Registration No. 200301015084 (617504-K)

(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY

1 POLICY STATEMENT

Elsoft Research Berhad (“Company” or “Elsoft”) is committed to ensure a high standard of corporate governance, business ethics and accountability in the conduct of its businesses and operations.

The Whistle-Blowing Policy (the “Policy”) is applicable to Elsoft and its subsidiary companies (“Elsoft Group”).

2 OBJECTIVES AND SCOPE

The Policy is established to:

- (a) facilitate employees and members of the public to disclose, report and raise concerns of any possible improper conduct; and
- (b) protect the individual from reprisal and safeguard such person’s confidentiality as a consequence of making a disclosure.

3 CONFIDENTIALITY AND PROTECTION

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

The whistleblower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his disclosure. If a whistleblower reasonably believes that he or she is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he may consult or report to the Chairman of the Audit Committee.

4 PROCEDURE

Any report / disclosure should be conveyed to any Member of Audit Committee, through email acm@elsoftresearch.com or directly to the Chairman of the Audit Committee, Mr. Lee Soo Ghee, through his email sooghee9098@yahoo.com for investigation and further action.

Disclosures received under anonymity will not be entertained to prevent malicious reporting, poison letters, exploitation and victimization.

The Chairman of the Audit Committee will deliberate on the report / disclosure with the committee members and the assistance from the CEO will be requested if necessary, before deciding on the appropriate course of action.

5 REVIEW OF POLICY

This Policy shall be reviewed periodically to assess their effectiveness, and in any event, at least once every three (3) years.