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POLICY TITLE

WHISTLEBLOWING POLICY

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1. Introduction

This Whistleblowing Policy (“this Policy”) is adopted by the Sum Technology Berhad (“STB” or “the Company”) and its subsidiaries (collectively referred to as the “Group”). The Company is committed to conducting business transparently, honestly and with integrity, and in accordance with applicable anti-bribery and anti-corruption laws.

As part of good corporate governance, the Company has set out the avenues for any known unethical, malpractices, wrongdoings or improper conduct within the Company (hereon referred to as “Concerns”) to be objectively investigated and addressed, as set out in this Policy. This Policy ensures that those who report such concerns will be safeguard, and their reports will be thoroughly investigated. A person or entity (hereon referred to as a “Whistleblower”) may disclose with reasonable belief that a Concern has occurred.


This Policy is to be read in conjunction with the Company’s

- Quality Policy;
- Anti-Bribery and Corruption Policy;
- Fit and Proper Policy;
- Anti Money Laundering Policy;
- Conflict of Interest Policy; and
- Applicable internal processes and procedures of the Group.

This Policy applies to all directors and employees (permanent, contract, probationary and temporary) of the Company, as well as external parties.

2. Protection

A Whistleblower who makes a disclosure of a Concern that has occurred, shall be protected by the Company from all acts of harassment, retaliation, victimization and recrimination arising from making the disclosure in good faith.

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The Company will consider mitigating circumstances if the Whistleblower himself/herself is involved in the activity that he/she reports. A Whistleblower's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation.

3. Confidentiality

Every effort will be made to treat the Whistleblower's identity with appropriate regard for confidentiality. The Company gives the assurance that it will not reveal the identity of the Whistleblower to any third party not involved in the investigation or prosecution of the matter, except in the event of an overriding legal obligation to breach confidentiality.


4. Concerns

Concerns that may be reported under this policy include, but are not limited to:

- Fraud, theft, or embezzlement
- Corruption or bribery
- Violations of laws or regulations
- Unsafe or harmful working conditions
- Discrimination, harassment, or retaliation
- Conflicts of interest
- Environmental, safety or health violations
- Misuse of company resources

All reports should provide as much detail as possible regarding the incident, including:

- Description of the incident or issue
- Date and time of occurrence
- Names of individuals involved (if known)
- Any evidence or documentation that supports the claim

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5. Disclosure of a Concern


Whistleblowers shall disclose a Concern via the QR code below:



6. Process of Handling Disclosure of A Concern

The Chairman or Human Resource, upon receiving a disclosure of Concern shall initiate the process for handling the disclosure which encompasses the following steps:

- a) Inquiries
 - To determine the validity of the disclosure and whether an investigation is appropriate, and the form that it should take.
- b) Investigation
 - If this is deemed necessary following the initial inquiries.
- c) Conclusion
 - From the investigation which may involve: disciplinary action or dismissal if the misconduct is in violation of the company procedures; or a report to the police or other appropriate law enforcement agency if a crime has been committed.

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7. Policy Review

This Policy will be review regularly to ensure it remains relevant, effective and in compliance with applicable laws and regulations.

Approved By,



Lee Thiam Hing

Executive Director

Date : 28 February 2026