



N2N CONNECT BHD. (523137-K)
(Incorporated in Malaysia)

WHISTLE BLOWING POLICY & PROCEDURES
(Approved on 31 March 2016)

1. Purpose

This policy is intended for N2N Connect Berhad ("N2N" or "the Company") and all subsidiary companies within the N2N Group ("the Group"). All employees of the Group play an important part in maintaining the highest level of corporate ethics within the Group, and have responsibility to disclose any known malpractices or wrongdoings (hereon referred to as "Concerns").

2. Safeguards

A person or entity making a protected disclosure is commonly referred to as a "Whistleblower". Whistleblowers provide initial information related to a reasonable belief that an improper activity has occurred.

Whistleblowers are protected against being dismissed or penalised by the Group, and N2N 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 Group 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. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by a court of law.

4. Procedures

4.1 Process for Disclosure

Impropriety

This policy covers improprieties or irregularities, suspected fraud or criminal offences, breach of confidentiality and failure to comply with legal or regulatory requirements.

Reporting

All employees shall report to the reporting person(s) as stated below on any allegations of suspected improper activities or employment-related Concerns.

Improper activities disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

Chairperson of Audit Committee ("AC"), Ms. Elaine Foong Sooi Jade

Address: 4, Jalan Damai Rasa 3,
Alam Damai,
56000 Kuala Lumpur.

Email: elainefsj@hotmail.com

Employment-related Concerns can be reported to:

Managing Director, Andrew Tiang

Address: Wisma N2N, level 9, Tower 2,
Avenue 3 Bangsar South No 8
Jalan Kerinchi
59200 Kuala Lumpur

Email: andrew.tiang@n2nconnect.com

Handling of a reported allegation

The action taken by the Group in response to a report of Concern under this policy will depend on the nature of the Concern. The Chairperson of AC and/or Managing Director shall receive information on each report of Concern and follow-up information on actions taken.

4.2 Investigator

The Internal Auditor shall be the named Investigator unless the Chairperson of AC and/or Managing Director assigns / appoints another Investigator. Investigators must be impartial and independent of all parties concerned.

The Investigator is required to report all Concerns raised, the status of all pending and on-going investigations, and any action taken or to be taken as a result of the investigations, to the Chairperson of AC and/or Managing Director.

4.3 Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some Concerns may be resolved without the need for investigation.

If an investigation leads the Investigator to conclude that a crime has probably been committed, the results of the investigation shall be reported to the police or other appropriate law enforcement agency.

If an investigation leads the Investigator to conclude that the suspect has engaged in conduct that may be a violation of the Group's Code of Ethics or Conduct, the results of the investigation shall be reported to the Managing Director and Chairperson of AC in accordance with the applicable procedures for company conduct and the administration of discipline. Any charges of misconduct brought as a result of an investigation under this policy shall comply with established disciplinary procedures.

5. Monitoring and Periodic Review of Policy

The Group must diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group, and, if necessary, implement changes subject to the approval of the Board of Directors.

This policy will be reviewed annually to assess its effectiveness.