

1.0 Policy Statement

AT Systematization Berhad (the “Company” or “ATS”) and its subsidiaries is committed to achieving and maintaining the high standards of transparency, accountability and integrity. In order to achieve the standards, the Board of Directors has introduced this “Whistleblowing Policy” (the “Policy”) to encourage employees and stakeholders (ie. shareholders / suppliers / customers) of ATS to raise genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns. ATS views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal. This policy is applicable to ATS and its subsidiaries.

2.0 Scope of the Policy

The Policy is designed to enable stakeholders and employees to raise concerns internally at the highest level and to disclose information which the employees believe the possible presence of malfeasance or wrongdoing within ATS, including but not limited to the following:-

- Financial malfeasance, wrongdoing or fraud;
- Misuse and/or misappropriation of the ATS’s fund or assets;
- Failure to comply with legal or regulatory obligations;
- Endangerment of an individual’s health & safety or the environment;
- Criminal offence;
- Breaches of Group Policies;
- Improper conduct or unethical behaviour or misuse of confidential information; and/or
- Concealment of any of the above or a combination.

The Policy is not designed to question financial or business decisions taken by the Board or management nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

3.0 Safeguards

ATS recognises that the decision to report a concern can be difficult. The employees should raise genuine concerns without fear of reprisals because he/she is doing his/her duty towards ATS.

4.0 Confidentiality

ATS will treat all concerns raised within the context of the Policy in a confidential and sensitive manner. The identity of the employee making a disclosure shall be kept confidential as long as it does not frustrate any investigation. However, the Policy encourages employees to put their name to their concern whenever possible in order for the Company to accord the necessary protection to her/him. Any anonymous whistleblower will not be entertained. However, the Company reserves its right to investigate into any anonymous disclosure. Any report should also be based on good faith with a reasonable belief that the information and any allegations are sustainably true and not acting for personal gain. Please note that:

- Employees must disclose the information in good faith;
- Employees must believe it to be substantially true;
- Employees must not act maliciously or make false allegations; and
- Employees must not seek any personal gain.

If, however, an employee makes malicious allegations, and to the extent he persists in making them whilst in-depth investigation shows no substantiation of the alleged facts, disciplinary action or dismissal may be taken.

5.0 Whistleblowing Channel

The Channel should be directed to the following person:

Dr. Ch'ng Huck Khoon

Chairman of Audit and Risk Management Committee

Lot 11.2, 11th Floor, Menara Lien Hoe,

No. 8, Persiaran Tropicana,

Tropicana Golf and Country Resort,

47410 Petaling Jaya, Selangor,

Malaysia.

E-mail : whistleblowing@atsys.com.my

Mail : Mark Strictly Confidential AT Systematization Berhad