



RGB International Bhd.
Registration No. 200301001411 (603831-K)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

(Last Review Date: 29 February 2024)

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1. OVERVIEW

- 1.1 RGB International Bhd. ("the Company") and its subsidiaries ("the Group") are committed to achieving and maintaining high standard of integrity, accountability and ethical behaviour in the conduct of its businesses and operations.
- 1.2 In order to achieve the standards set therein, the Company therefore encourages all its employees and stakeholders to disclose any improper conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and stakeholders who report such allegations.

2. SCOPE OF WHISTLEBLOWING POLICY

- 2.1 The primary purpose of this policy is to govern the reporting and handling of the Group's wrongdoing. This policy does not replace the Group's existing policy for handling employee grievances or similar complaints.
- 2.2 Wrongdoing shall mean, but not limited to, reporting of fraudulent financial information, actual or suspected fraud, misappropriation of monies, misrepresentation, conceal facts or information with intention to mislead, violation of laws and regulations, endangerment of employees or public health and safety, violation of Group's policies, taking, soliciting, promising, offering or giving bribes, kickbacks, favours, privileges, criminal offence and blackmailing.

3. REPORTING IN GOOD FAITH

- 3.1 The Company expects the employees and stakeholders to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal and to act in good faith and have reasonable grounds when making a report. Malicious and false allegations reported by employees will be viewed seriously and treated as gross misconduct and if proven may lead to dismissal. The Company will also take appropriate action against the employees and/or stakeholders concerned including legal action, where applicable.
- 3.2 A report on wrongdoing may be made if the employees and/or stakeholders have reasonable belief that the alleged wrongdoer is engaging, has engaged, or is prepared to engage in wrongdoing. The whistleblower is not expected to have substantial evidence of proof beyond reasonable doubt or be able to identify a particular person to which the report relates.

4. PROTECTION TO WHISTLEBLOWER

- 4.1 A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed within the Group, to the extent reasonably practicable, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

- 4.2 The Group views any harassments or retaliations in any form or manner against genuine whistleblower seriously and will treat such actions as gross misconduct which if proven may lead to dismissal.

5. REPORTING WRONGDOING

- 5.1 The whistleblower should promptly report the suspected or instances of wrongdoing to the Chairman of the Board of Directors and/or Chairman of the Audit Committee. The report must be in writing, submit via post or email, to ensure that there is a clear understanding about the issues raised. If desired, the whistleblower may disclose the said suspected or instances of wrongdoing via Whistleblowing Disclosure Form as set out in Appendix A.

| | |
|-------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mail | Chairman of the Board of Directors and/or Chairman of the Audit Committee RGB International Bhd 8 Green Hall, 10200 Penang, Malaysia <i>Mark Strictly Confidential</i> |
| Email | Chairman of the Board of Directors: disclosure_bod@rgbgames.com Chairman of the Audit Committee: disclosure_ac@rgbgames.com |

- 5.2 The Chairman of the Board of Directors and/or Chairman of the Audit Committee who receives the report must promptly act to investigate and resolve the issue.
- 5.3 The whistleblower shall be informed on the outcome of the investigation.
- 5.4 All investigations shall be tabled to the Board of Directors that has the authority to ensure effective implementation of the whistleblower policy.

6. WHISTLEBLOWER PROTECTION ACT 2010

- 6.1 In the event that there are discrepancies between this policy and the Whistleblower Protection Act 2010, the Act shall prevail.

Appendix A

WHISTLEBLOWING DISCLOSURE FORM

STRICLTY CONFIDENTIAL

| | |
|--------------------------------------------------------------------------------------------------------------------|--|
| Name of involved person(s) | |
| Designation/Department of involved person(s) | |
| Date of incident | |
| Location of incident | |
| Details of incident <i>(please attach separately, if necessary, and sign off at the end of each attachment)</i> | |
| Estimated value of incident <i>(if it is known)</i> | |
| Details of evidence and witness(es) <i>(please attach separately, if any)</i> | |

DECLARATION

I hereby declare that the details provided herein are made voluntarily and are true to the best of my knowledge and belief. I undertake to inform you, immediately, of any changes therein.

(Signature)

Name :
Department/Agency :
Contact No. :
Email :
Date :