

Whistleblowing Policy

Introduction

INTI strives to conduct its business with integrity, competence and professionalism while achieving the highest level of effectiveness and excellence. Hence, it is important that we are alerted of any actual or potential improper conduct which compromises these aspirations.

INTI views 'Whistleblowing' as a positive act that can make a valuable contribution to the institution efficiency and long-term success. It is not disloyal to colleagues or INTI to speak up as INTI is committed to achieve the highest possible ethical standards in the way we conduct our business. To help achieve these standards we encourage anyone with information to speak up by putting in place a Whistleblowing Policy to ensure that concerns about wrongdoing or malpractice are raised without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

The policy is also intended to encourage and enable concerns to be raised to INTI rather than ignoring a problem or 'blowing the whistle' outside.

With this, the Policy aims to:

- encourage Whistle-blower to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for Whistle-blower to raise those concerns and receive feedback on any action taken
- ensure that Whistle-blower receive a response to the concerns and that the Whistle-blower are aware of how to pursue them if you are not satisfied
- reassure Whistle-blower that you will be protected from possible reprisals or victimisation of any disclosures made in good faith.

What is Whistleblowing?

Whistleblowing is the voluntary disclosure of inappropriate, unethical or unlawful behavior and practices by the management or employees. It includes how employees, customers and investors are treated. The following are generally accepted as improper and reportable conduct for whistleblowing, of which the list is not exhaustive:

- Any unlawful or illegal activities, whether criminal or breach in civil law;
- Breach of policies and/or procedures;
- Fraud, theft, embezzlement or dishonesty;
- Corruption/bribery;
- Bullying and harassment;
- Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets;
- Forgery or alteration of any documents belonging to the Company, customers, another Educational Institution, or agents of the Company;

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- Poor or unethical sales practices, including mis-selling;
- Profiteering as a result of insider knowledge;
- Gross mismanagement or dereliction of duties;
- Conflict of interest;
- Misuse of position or information; and
- Any other similar or related irregularities.

Who is a Whistleblower?

Generally, a whistleblower is an insider of an organization (e.g. employee, consultant or vendor) who reports improper conduct that has occurred within that same organization. In an effort to encourage whistleblowers to come forward with information on any alleged improper conduct, our Malaysian government has enacted the Whistleblower Protection Act 2010 to provide safe avenues to whistleblowers to make disclosures of such alleged improper conduct (whistleblowing) to the relevant authorities in good faith, by protecting their identities, providing them with immunity from civil and criminal proceedings and protecting them from detrimental action.

Protections Given

INTI is committed to provide the whistleblower protections as outlined under the Whistleblower Protection Act 2010.

The following protections will be accorded to a whistleblower who makes a disclosure of improper conduct to INTI in good faith:

- confidentiality of identity;
- immunity from civil and criminal liability for the disclosure made; and
- protection from detrimental action.

There may be certain circumstances where the identity of the whistleblower may need to be revealed on a need to know basis (e.g. requirement to testify in court). If such a situation arises, INTI shall discuss and seek consent with the whistleblower first before proceeding with the case.

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, INTI will recognize your concern and you have nothing to fear.

However, the protection will be removed if it is found that the whistleblower was also involved in the improper conduct, or if the whistleblower is found to have made the

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disclosures in bad faith - frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

How to Make a Disclosure?

We take whistle blowing seriously and your concern matters to us, so we would like to hear from you if have come to know of any improper practices occurring within INTI. Any disclosure can be made to the following dedicated reporting channels:

Link: <http://intiethics.newinti.edu.my>

We encourage Whistle-blowers to leave contact details to enable follow up enquiries from the Investigation Officer which in most cases will be required for the purpose of conducting quality investigation. If the Whistleblower would be uncomfortable or otherwise reluctant to do so, then we ask that the Whistle-blower to be as detailed as possible in the disclosure including giving sufficient evidences.

All submissions including the identity of the Whistle-blower will be treated with the strictest confidentiality, and verified concerns will be addressed in a transparent and independent manner.

Investigation

The submission will be routed to the Legal Counsel and Head of Group Human Resources who are the primary Investigation Officers for cases received. However if the report is against the Legal Counsel and/or Head of Group Human Resources, the Group CEO is then the appointed Investigation Officer to receive the reported concerns.

How the concern will be dealt with, will depend on what it involves and how much information is provided including if the Whistle-blower leaves any contact details to enable follow up questions/clarifications.

In most cases, it is likely that further enquiries and/or investigation will be necessary.

If the Whistle-blower had chosen to leave contact details, the amount of contact between the Whistle-blower and the officers will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. It is likely that the Whistle-blower will be interviewed to ensure that the disclosure is fully and accurately understood.

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Where appropriate, the matters raised may:

- be investigated through the disciplinary/grievance process / an independent inquiry
- be referred the police
- be referred the appointed external auditor
- be referred the independent investigator

Becoming Witness

All concerns will be treated in confidence and every effort will be made not to reveal the Whistle-blower's identity. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without the Whistle-blower's help, so the Whistle-blower may be asked to come forward as a witness. If agreed, the Whistle-blower will be consulted prior and will be offered advice and support.

Providing feedback on the Investigation

INTI will give the Whistle-blower feedback on the progress and outcome of any investigation wherever possible provided that contact details are provided.

If the suspicions are not confirmed by an investigation, the matter will be closed. But INTI will take note of the process lapses (if any) and put in sufficient control to deter similar cases from potentially happening in the future.