

POLICY STATEMENT

MICTH is committed to promote and maintaining high standards of transparency, accountability, ethics, moral and integrity at the workplace. An accountable and transparent workplace provides a mechanism for employees to voice genuine concerns in a responsible and appropriate manner.

OBJECTIVE

This Policy is to provide a platform for all employees of MICTH and third parties who has become aware of or genuinely suspects on a reasonable belief that an employee of the Company has engaged, is engaged or is preparing to engage in any Improper Conduct in accordance with the procedures as provided for under this policy and to provide protection for employees and third parties who report such allegations.

SCOPE OF THE POLICY

This policy is designed to facilitate employees and members of the public to disclose any improper conduct (misconduct or criminal offence) through internal channel. Such misconduct or criminal offences include the following:

- 1. Fraud;
- 2. Bribery;
- 3. Abuse of Power;
- 4. Conflict of Interest;
- 5. Theft or embezzlement;
- 6. Misuse of Company's Property;
- 7. Non-Compliance with Procedure.

The above list is not exhaustive and includes any act or omissions, which if proven, will constitute an act of misconduct under MICTH's Service Policy applicable or any criminal offence under relevant legislations in force. This policy is not to invalidate the Disciplinary Action Process and Procedures of MICTH but to provide more avenues for employees and third parties to disclose improper conduct committed or about to be committed to the Company.

APPLICABILITY OF THE POLICY

This policy applies to all employees of MICTH. This policy also applies to third parties, where relevant.

PROCEDURE IN MAKING A DISCLOSURE

All disclosures of Improper Conduct are to be channelled via email to integrity@micth.com.

PROTECTION TO WHISTLEBLOWER

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 MICTH, 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

ANONYMOUS WHISTLEBLOWER

Any anonymous disclosure will not be entertained. Any employee or third parties who wishes to report improper conduct is required to disclose his identity to the Company for the Company to accord the necessary protection to him. However, the Company reserves its right to investigate into any anonymous disclosure.

NOTIFICATION

The Whistleblower shall be informed of the result of any investigation and/or any action taken by the Company in respect of the disclosure in accordance with the Policy.

REVIEW OF THIS POLICY

MICTH reserves the right to amend this policy from time to time. This Policy is approved by the Board of Directors of MICTH on 20th February 2022.