



Company Registration No.: 201101014489 (Malaysia)

Headquarters: B-12-01, Atria Damansara, Jalan SS 22/23, Damansara Jaya, 47400, Petaling Jaya, Selangor, Malaysia.

Website: <https://www.trides.com.my>

Contact: info@trides.com.my

TRIDES SDN BHD — Whistleblowing Policy

1. Introduction

At TRIDES Sdn Bhd (“TRIDES”), integrity and transparency form the foundation of our business culture. This Whistleblowing Policy establishes a formal mechanism for employees, business partners, and external stakeholders to report concerns about misconduct, unethical behavior, or any violation of laws and company policies, including corruption, fraud, and breaches of the Code of Conduct & Ethics.

TRIDES is committed to ensuring all reports are handled confidentially, fairly, and without fear of retaliation.

2. Purpose

The objectives of this policy are to:

- Encourage employees and stakeholders to report actual or suspected misconduct in good faith.
- Provide clear channels for raising concerns.
- Protect whistleblowers against retaliation or unfair treatment.
- Promote a culture of accountability and good governance across TRIDES operations.

This policy complements the Anti-Bribery and Corruption (ABC) and Code of Conduct & Ethics policies.

3. Scope

This policy applies to:

- All directors, officers, and employees (permanent, temporary, or contract).
- Consultants, contractors, suppliers, partners, agents, and any third parties acting on behalf of TRIDES.

Whistleblowing reports may cover, but are not limited to:

- Bribery, corruption, or fraud.
- Financial mismanagement or falsification of records.
- Unethical business practices or abuse of authority.
- Breach of legal obligations or company policies.
- Discrimination, harassment, or workplace misconduct.
- Data protection or cybersecurity violations.

4. Reporting Channels

Whistleblowers may report concerns through any of the following confidential channels:

- Email: compliance@trides.com.my
- Direct Reporting: Company Secretary (Compliance Office)
- Manager / Supervisor: For employees who prefer internal escalation
- Postal Submission: Confidential — To: Compliance Office, TRIDES Sdn Bhd, B-12-01, Atria Damansara, Jalan SS 22/23, Damansara Jaya, 47400, Petaling Jaya, Selangor, Malaysia.

Reports should include sufficient details (persons involved, date, description, evidence if available) to facilitate investigation.

Anonymous reports are accepted; however, providing contact information is encouraged for effective follow-up.

5. Confidentiality and Protection

All whistleblowing reports will be treated in strict confidence. TRIDES will take all reasonable steps to protect the identity of whistleblowers and the information disclosed.

The company strictly prohibits any form of retaliation, harassment, or disciplinary action against whistleblowers who act in good faith, even if the report is later found unsubstantiated.

Any employee or manager found retaliating against a whistleblower will face disciplinary action.

6. Handling and Investigation

1. The Compliance Office will acknowledge the report and initiate preliminary review within seven (7) working days.

2. If the case warrants investigation, it will be referred to the Whistleblowing Review Committee (WRC) consisting of representatives from Management, Legal, and HR.

3. The Committee will conduct a fair and impartial investigation.

4. Upon completion, the outcome and any recommended corrective actions will be documented and reported to the Board of Directors.

All investigations and outcomes will be recorded and retained in accordance with TRIDES's record-keeping procedures.

7. Good Faith and False Allegations

Whistleblowers are expected to act in good faith and provide accurate information. Reports made maliciously, with intent to defame or mislead, may result in disciplinary action.

8. Awareness and Communication

This policy will be made available to all employees and published on the TRIDES website. All staff and business partners will be periodically reminded of their right and duty to report unethical conduct.

9. Review and Approval

This policy will be reviewed periodically to ensure alignment with applicable laws and best practices, including the MACC Act 2009 (Section 17A) and ISO 37001 Anti-Bribery Management System requirements.

10. Endorsement

This Whistleblowing Policy has been reviewed and approved by the Board of Directors of TRIDES Sdn Bhd and is effective as of January 2025

TRIDES SDN BHD
Driving Digital Identity, Securely and Responsibly.