



NTT DATA Payment Services Sdn. Bhd.
(formerly known as GHL Systems Sdn. Bhd.)
Group Whistleblowing Policy

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1. INTRODUCTION & OBJECTIVE OF THE POLICY

As a subsidiary of NTT DATA Japan Corporation, NTT DATA Payment Services Sdn Bhd (the “**Company**”), its related corporations as defined under the Companies Act 2016, and any other entities within the NTT DATA Group for which NTT DATA Payment Services Sdn Bhd provides management oversight and strategic direction as the regional headquarters, now and in the future, with each such company being a member of the NTT DATA Payment Services Group of Companies (the “**Group**”) is dedicated to upholding the principles and standards of the NTT DATA Group Whistleblowing Policy.

In compliance with the NTT DATA Group Whistleblowing Policy, the Company has implemented this Group Whistleblowing Policy (“**Policy**”) to ensure a secure, confidential, and accessible channel for reporting misconduct, unethical behavior, or policy violations. This Policy adheres to the principles of the NTT DATA Group and complies with mandatory local legal provisions.

The Policy is available to directors, senior management, and employees of The Group, as well as our customers, partners, merchants, vendors, service providers, government intermediaries, and other stakeholders (“**External Third Parties**”) with a business relationship with the Group. It offers an independent mechanism to report integrity concerns or misconduct and informs the Board of Directors about any improprieties at an early stage.

The Group expects the highest standards of integrity from its directors, senior management, employees, and related External Third Parties, taking a serious view of any misconduct, particularly when it affects the company’s interests. This Policy is aimed to:

- a. Develop a culture of openness, accountability and integrity within the Group;
- b. Provide a consistent, systematic, company-wide process for managing any actual or potential improper conduct;
- c. Encourage all directors, senior management, employees, and External Third Parties to raise genuine concerns about suspicious circumstances as early as possible, knowing that their confidentiality will be respected and that their identity will remain anonymous; and
- d. Reassure all directors, senior management, employees, and External Third Parties that they should be able to raise genuine concerns without fear of reprisal, even if they turn out to be mistaken.

2. WHISTLEBLOWING

Any of the following persons (“**Whistleblower**”), who is reasonably acting in good faith, can make a report to the Group of any suspected or actual misconduct committed by any of its directors, senior management, employees, and External Third Parties:

- i. the employees;
- ii. board of Directors;
- iii. any External Third Parties;
- iv. members of the public.

The Policy is intended for reporting genuine concerns involving serious or sensitive incidents of misconduct. All reports must be made in good faith, with a reasonable belief that the information is substantially true and not for personal gain. While identifying a specific individual responsible for the

misconduct is helpful, it's not required to file a report. However, Whistleblowers themselves cannot have participated in the misconduct or be in violation or attempted violation of the law.

Submitting false, misleading, or malicious reports, including those intended to harm the Group or a third party, is strictly prohibited. Such actions may result in disciplinary action, up to and including termination of employment, in accordance with company policies, employment contracts, and applicable law.

A Whistleblower can report a whistleblowing incident if he/she is aware of any misconduct or wrongdoing ("**Improper Conduct**"), committed or about to be committed, including but not limited to the following:

- Suspected Criminal Offence
- Non-compliance with Regulatory Requirements and/or Group Policies
- Fraud, Money laundering, Corruption, or Bribery
- Misappropriation of Assets or Theft or Embezzlement
- Sexual Harassment or Bullying
- Financial and/or Professional Misconduct, Negligence, Unfair Treatment
- Unethical Behaviour and Dishonesty
- Receiving and/or Soliciting Graft and Kickbacks
- Misuse of Confidential Information
- Misuse of Company Properties
- Abuse of Authority
- Impersonating of Officials
- Attempts to Suppress or Conceal any information relating to any of the above

The above list is not exhaustive and shall additionally include any act or omissions, which if proven, will constitute an act of misconduct under the Group's Anti-Bribery and Corruption Policy or any criminal offence under any relevant Legislations or Acts of a particular jurisdiction.

3. WHISTLEBLOWING CHANNELS

A report can be made via the following:

Email: wb@whistleblowerghl.com

The whistleblowing channel above is secure and accessible only by Internal Audit which in turn will report all whistleblowing incidents to the Board of Directors.

Or, if you believe that this matter is serious enough to warrant involvement of NTT DATA Headquarters, you may contact NTT DATA Global Whistle Line providing multilingual support:

Name: Ogasawara & Partners International Law Firm

Email: nttdata_whistleline@ogaso.com

4. DISCLOSURE REQUIREMENTS

A report shall be made and submitted together with the following information:

- Details of the Whistleblower (strongly encouraged even though Whistleblower may choose to remain anonymous);
- Type of Improper Conduct;
- Details of suspected personnel involved;
- Particulars of witnesses (if any);
- Details of incident (including date, time, and location of incident); and
- Any supporting/documentary evidence

5. PROTECTION TO WHISTLEBLOWERS

The following protections will be accorded to a Whistleblower who makes a disclosure of Improper Conduct to the Group in good faith:

- confidentiality of identity;
- immunity from civil and criminal liability for the disclosure made;
- protection from detrimental actions such as dismissing or threatening to dismiss the whistleblower;
- taking disciplinary actions, suspending, or threatening to discipline or suspend the whistleblower;
- subjecting the whistleblower to any form of harassment or abuse; and
- imposing any penalty, directly or indirectly, on the whistleblower.

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 disclosures in bad faith.

6. CONFIDENTIALITY

All whistleblowing reports will be investigated and the identity of the Whistleblower, if known, will be fully protected. All information in respect to the reports received will be treated as confidential and will not be disclosed without the written consent of the whistleblower, save to the extent permitted by law or required for the purposes of making a report to the relevant authorities. The identity of parties reporting a Whistleblowing report will be kept confidential and protected. Whistleblowers are protected under the Laws of Malaysia Act 711: The Whistleblower Protection Act 2010. However, the person making anonymous report will be advised that maintaining anonymity may hinder the proper investigation of the allegations.

7. ACTING IN GOOD FAITH

The Group expects Whistleblowers to act in good faith and have reasonable grounds when reporting an incident.

If the Whistleblower is not an employee, but a vendor, supplier or business partner, the Whistleblower shall not be denied future business with the company solely on the basis of having made such a report; unless it also appears from the facts of the case that the Whistleblower participated in the prohibited conduct with sufficient knowledge that the same was illegal, prohibited, unethical, or would be to the detriment and prejudice of the Group.

8. PROTECTION FROM RETALIATION

Any party, that attempts to retaliate, victimize or intimidate those who has reported a wrongdoing in good faith, shall be dealt with serious disciplinary actions and procedures, up to and including legal action, where applicable.

The legal action may be instituted before a court of competent jurisdiction within one (1) year after the action prohibited by this section is committed, and without the need for exhausting all other available contractual or administrative remedies.

No employee may be compelled to adjudicate his or her rights pursuant to a collective bargaining agreement or any other arbitration agreement.

9. INVESTIGATING PROCEDURES

Reports will be reviewed jointly and promptly by the the Company's Whistleblowing Panel ("**Panel**") which may consist of the Group Chief Executive Officer, the Group Head Human Resource and the Group Head, Legal, Compliance & Sustainability insofar as they are not the subject of the investigation. However, if any of these individuals are themselves implicated in the reported misconduct, the company will appoint replacements from within the senior management to ensure impartiality and avoid conflicts of interest.

Upon completion of the investigation by the Panel and should the need for a further investigation be warranted, the Panel may then convene an Independent Investigation Panel ("**IIP**") which shall consist of members of professional bodies such as that from the association of Lawyers and/or Accountants or alternatively use any and all resources available as well as the assistance from other teams within the Group to further investigate the reports or reports in accordance with the following procedures:

- Upon receipt of a report, the Panel will, conduct an initial enquiry of the report to determine its genuineness and the seriousness of the concern or allegation which has been raised.
- If the initial enquiry made by the Panel indicates that the report has no basis or merits or it is not a matter to be dealt with under this Policy, it may be dismissed by the Panel and no further action shall be taken.
- If the initial enquiry indicates that further investigation is necessary, the Panel will immediately carry out a thorough and independent investigation into the report. Such investigation will be conducted in a fair manner as a neutral fact-finding process and without any presumption of guilt.
- The Panel shall have the right to ask for any information and documents and to examine any employees of the Group or any other person(s) as it may deem appropriate for the purposes of conducting its investigation. The findings of the initial enquiry by the Panel and the further investigation (if any) will be compiled and reported to the Board of Directors along with a recommended course of action to be taken to address such misconduct.

The Whistleblowing Panel may, under exceptional circumstances, with the endorsement of the Group CEO and with the approval of the Board of Directors, grant immunity to a Whistleblower who has participated in the Improper Conduct reported. In any event, immunity may only be granted to a Whistleblower under the following conditions:

- The Whistleblower, who is being considered for immunity, must not be the most culpable party to the investigation;
- The Whistleblower's testimony must be absolutely indispensable to the investigation without which, the company would not be able to take appropriate action;
- The Whistleblower extends full cooperation to the investigation.

To facilitate investigations, the Group Head of Human Resources may request an employee accused of misconduct to go on a leave of absence, as per the employee handbook policies.

10. REVERTING TO WHISTLEBLOWER

The Group reserves the right not to inform the Whistleblower of the status of report, and/or the precise action plan and outcome of the investigation, as this may infringe a duty of confidentiality.

11. WHISTLEBLOWER PROTECTION ACT 2010

The Malaysian Whistleblower Protection Act 2010 (“**Act**”) protects persons making disclosures of Improper Conduct in the public and private sector from civil and criminal action. In addition, the Act allows for proper investigation to be carried out by an enforcement agency set up by the Federal Government, State Government or local government (“**Enforcement Agency**”).

If a Whistleblower wishes to make a report of Improper Conduct pursuant to the Act, then he/she will have to make the said report to an Enforcement Agency. Any investigations and/or actions taken thereafter would be in accordance with the Act and are independent of the procedures described in this Policy.

Whilst the Company respects the rights of the Whistleblower to directly make reports of Improper Conduct to an Enforcement Agency, the Group advises and urges a report of Improper Conduct of an Employee is made to the Group wrongdoings and where applicable, institute the appropriate controls to prevent any serious damage to the Group.

While the parent company, NTT DATA Japan Corporation, is located in Japan, the Company is incorporated in Malaysia. The Act sets the minimum standard which must be complied across its business and operations within the Group in the ASEAN region and shall be applied across all countries that the Group operates. In cases of any discrepancies between local laws and the Act, the said whistleblowing laws of that country shall prevail.

12. CONSEQUENCES OF WRONGDOINGS

The Group’s Board of Directors and senior management team in particular the Group Human Resources Department will take serious and consistent action against any party who is determined to have acted in violation of this Policy including but not limited to:

- Reprimanding and taking disciplinary action,
- Imposing punishment as appropriate
- Termination or suspension of employment
- Reporting to the relevant authorities (if applicable)
- Any other action deemed appropriate by the Executive management and/or the Board of Directors.