

Whistle Blowing/Speak Out Policy

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1. Purpose

The purpose of this policy is to formalize the Company's commitment to enabling its stakeholders including employees, shareholders and business associates to make fair and prompt disclosure of circumstances where it is genuinely believed that the Company's business is being carried out in an inappropriate manner or in violation of Company's policies, procedures and ethical values.

2. Policy

This policy applies to all Companies of Gatronova group; and aims to cover the following aspects;

- Develop a culture of respect, openness, accountability and integrity.
- Provide a method of properly addressing bonafide concerns that individuals within the Company might have, whilst offering them the necessary protection from victimisation, harassment and/or disciplinary proceedings;
- Provide a conducive environment to stakeholders to raise concerns against unethical conduct which may create financial and reputational risks for Company;
- Raise awareness among stakeholders regarding whistleblowing and alleviate their concerns;
- Enable Company to be informed at an early stage about fraudulent, immoral, unethical or malicious activities or misconduct and to allow appropriate actions to be taken.

Employees shall be encouraged to share and discuss their concerns with their line managers. However, if they do not wish to share or discuss their concerns with their line managers, then employees may raise the concern through the "Speak Out" hotline +923205696702 or email to speakout@gatronovotex.com.

This Policy shall not be intended to be used for reporting career-related concerns (such as promotion, performance evaluation etc.) or customer service complaints and these should be directed towards relevant departments.

All complaints raised through the "Speak Out" hotline number and email shall be restricted to and only be accessible by the Chairman of Board Audit Committee/ Director / Chief Internal Auditor for initial evaluation of complaint. After initial evaluation of complaint, the Chairman of Board Audit Committee/

Director / Chief Internal Auditor shall decide the next step in terms of assessment of complaint and ask Internal Audit to internally investigate the complaint who may also decide to collaborate with any relevant department or may appoint third party consultant for investigation, which it may think necessary.

3. Guidelines

i. Reportable Conduct

All stakeholders shall be expected to not only abide by Gatronova Group Company's standards of Code of Conduct but also to Speak Out and report any violations of Gatronova Group policies and procedures.

Whistleblowers shall be encouraged under this Policy to report their concerns including, but not limited to the following:

- Actions that may damage the reputation of the Company;
- Actions that are fraudulent or lead to a loss of assets;
- Actions that amount to an abuse of authority or position;
- Transactions that may be intended to result in incorrect financial reporting;
- Procedures that are in violation of Company's Code of Conduct and associated policies;
- Activities that are in violation of Health & Safety standards applicable to the business;
- Activities that give rise to harassment, discrimination or other unfair employment practices;
- Deliberate concealment of any of the above matters.

Any complaint which is misleading or knowingly untrue may be considered as a breach of Company code of conduct and may result in disciplinary action

While reporting the concern, as much detailed information as possible should be provided so that the report can be investigated thoroughly. Some useful details include but not limited to the following:

- Date, time and location;
- Names of person(s) involved, roles and their departments;
- Relationship with the person(s) involved;
- The general nature of your concern;
- How you became aware of the issue;

- Possible witnesses; and
- Any other supporting information.

Whistleblowers may also choose to highlight concerns anonymously and if so, shall still be protected under this Policy. However, requiring complete anonymity may practically make it more difficult for Company to investigate the issue or take the needed action. By disclosing their identity, whistleblowers shall enable the entrusted authority to contact them directly to discuss their concerns which allows quicker and more efficient complaint handling.

ii. Investigation

In order to protect individuals, initial enquires shall be made to decide whether an investigation is appropriate and, if so, what form it should take. Some Speak Out may be resolved by agreed action without the need for investigation.

While the circumstances of each complaint may require different investigation steps, all investigations shall:

- Follow a fair process;
- Be conducted as quickly and efficiently as the circumstances permit;
- Determine whether there is enough evidence to substantiate the matters reported; and
- Be independent of the person(s) concerned with the allegations.

Results of the investigation shall be required to be compiled within 30 days (subject to the nature of the case).

Company may notify the complainant once an investigation has been completed but may be unable to disclose details or the outcome of the investigation to the complainant.

All whistleblower reports and outcomes of investigations shall be reported to the Board Audit Committee/Director which shall review the outcomes and determine appropriate actions to respond to the matters raised.

iii. Protection

The confidentiality of complainants shall be ensured, and the person shall be protected from any form of retaliation or victimization for genuinely held concerns that are raised

in good faith. Any personal information of complainant shall not be included in any report that is provided to the management or the Board Audit Committee.