

EPB GROUP BHD	DOC. NO.	EPBG-POL-MO-11
Registration No.: 202201007128 (1452825-U)	REV. NO.	0
DOCUMENT: WHISTLEBLOWING POLICY & PROCEDURES	EFF. DATE	01 APR 2022

1.0 INTRODUCTION

In line with corporate governance practices as prescribed in the Malaysian Code on Corporate Governance 2021, the introduction of the Whistleblower Protection Act 2010 and relevant provisions under the Malaysian Anti-Corruption Commission Act, 2009 (as amended), the Board of Directors and the management of EPB Group Bhd and its subsidiary companies (“**Group**”) are committed to conduct our business activities with integrity, in a law-abiding manner.

In this connection, the Group has developed a policy and framework on whistleblowing to facilitate the reporting of suspected and / or known Improper Conduct (as defined below) involving any employee or Director of the Group without being concerned with reprisal and / or retaliation (including victimization, harassment or discriminatory treatment) against him / her, and such reported concerns shall be investigated and appropriate actions shall be taken if an Improper Conduct has been committed.

2.0 OBJECTIVES

The objective of this policy is to outline the framework for any person who wishes to make a whistleblowing report (“**Whistleblower**”) to be able to raise genuine concerns in relation to any improper conduct by any employee, Director or any service provider of the Group (“**alleged wrongdoer**”) (including any misconduct, wrongdoings, corruption, fraud and/or abuse of power) at the earliest opportunity without being subject to reprisals and/or retaliation (including victimization, harassment or discriminatory treatment) and to have such concerns properly investigated and appropriate actions to be taken.

Apart from protecting the Whistleblower from any reprisal as a direct consequence of making a complaint, it also aims to safeguard the Whistleblower’s confidentiality and to treat both the Whistleblower and alleged wrongdoer fairly. The identities and personal information of the Whistleblower and the alleged wrongdoer shall be kept in confidential as far as possible.

3.0 SCOPE & DEFINITION

This Policy is designed to facilitate employees and members of the public who are aware of or genuinely suspect that an employee, Director or service provider of the Group has engaged or is engaging in any Improper Conduct (as defined below) and wish to report such Improper Conduct through the channels which have been established by the Company for this purpose for further investigation.

An Improper Conduct is any act, omission or conduct that is unlawful, illegal, immoral, unethical, dishonest, improper or wrong, and may include, but is not limited to:

- a) a criminal offence;
- b) failure to comply with any laws or regulations;
- c) unethical behaviour or breach of code of conduct & Business ethics
- d) misuse or misappropriation of the Group's funds or assets;
- e) misuse of confidential information;
- f) acts that adversely affect the interest or values of shareholders;
- g) fraud, corruption, bribery, blackmail, money laundering;
- h) sexual harassment; and
- i) concealment/cover up of any of the above.

This policy is not intended for employees to lodge Employee grievances or appeal on disciplinary procedures. Employees can report Employee grievances or lodge appeals on disciplinary procedures through our company’s human resources department.

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Employees and Third Party should exercise due care to ensure that the information in their whistleblowing report is accurate and truthful. No action will be taken against Employees or Third Party who make an allegation in good faith which is not confirmed by subsequent investigation. This protection may be revoked if Employees and Third Party misuses or abuses the Whistleblowing Policy by making false, frivolous, malicious or vexatious allegations.

4.0 POLICY & PROTECTION

4.1 Anonymity

It is the policy of the Group to allow the Whistleblower to either identify themselves or if they prefer, to remain anonymous when reporting suspected and / or known instances of Improper Conduct. However, the effectiveness of an investigation into an anonymous report may be affected by the anonymity.

4.2 Assurance against reprisal and/or retaliation

Where the Whistleblower has chosen to reveal his / her identity, it is the policy of the Group to provide assurance that the Whistleblower would be protected against reprisals and / or retaliation from his / her immediate superior or head of department / division or from the management of the Group.

In addition, the Group provides assurance that no disciplinary action can be taken against the Whistleblower who is an employee of the Group as long as he / she does not provide false information in the report "*purposely, knowingly or recklessly*" i.e. the report is basically malicious in nature.

4.3 Confidentiality

The Group shall treat all reports or disclosures as sensitive and will only reveal information on a "need to know" basis or if required by law, court or authority. The identity and particulars of the Whistleblower shall also be kept private and confidential unless the Whistleblower chooses to reveal his / her identity. Where the Whistleblower has chosen to reveal his / her identity when making such a report, written permission from the Whistleblower would be obtained before the information is released.

5.0 REVOCATION OF POLICY & PROTECTION

The protection to the Whistleblower as stated above may be revoked by the Group if:

- a) the Whistleblower himself has participated in the Improper Conduct;
- b) the Whistleblower wilfully or maliciously made his disclosure, knowing or believing the information is false or untrue;
- c) the disclosure is frivolous or vexatious; or
- d) the disclosure is made with the intention or motive to avoid dismissal or other disciplinary action.

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6.0 PROCEDURES ON WHISTLEBLOWING

6.1 Reporting

- i. A report of improper activities may be made when any of the following conditions are met:
 - a) the matter is the result of a significant internal control or policy deficiency that is likely to exist at other units within the Group or across the internal control system;
 - b) the matter is likely to receive media or other public attention;
 - c) the matter involves the misuse of the Group's resources or creates exposure to a liability in potentially significant amounts;
 - d) The matter involves allegations or events that have a significant possibility of being the result of a criminal act (e.g. disappearance of cash or asset);
 - e) The matter involves a significant threat to the health and safety of employees and / or the public; or
 - f) The matter is judged to be significant or sensitive for other reasons.
- ii. Such disclosures, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to the Audit Committee ("AC") Chairman.
- iii. Disclosures can be emailed to whistleblowing@epb.group with a completed "Report of Improper Conduct, Wrongdoings, Corruption, Fraud, Waste & / or Abuse" form ("Whistleblowing Form") provided in Appendix 1.

6.2 Handling of a reported allegation

The action taken by the Group in response to a report of concern under this policy will depend on the nature of the concern.

6.3 Decision

- a) The Audit Committee will review the report and appoint an investigations committee whether internal or external.
- b) Upon completion of investigation, the Audit Committee will decide as to whether the allegation was substantiated or not. The final report together with the recommendations of the Audit Committee will be tabled to the Board of Directors.
- c) The Board of Directors will review the final report and decide on the corrective action to be taken and / or the disciplinary action to be taken (if any).
- d) Subject to any prohibition in law or any legal requirements, the AC Chairman will inform the Whistleblower that the investigation has been completed and the findings have been presented to the Audit Committee or the Board of Directors as the case may be. As the findings are confidential, the details of the findings will not be disclosed to the Whistleblower.

6.4 Corrective Action

- a) The Management shall carry out the decisions of the Board of Directors in relation to the findings of the investigation.
- b) Where applicable, the Management shall institute the appropriate controls to prevent any further wrongdoings or damage to the Group.

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6.5 DISCIPLINARY ACTION

Any disciplinary action shall be carried out in accordance with the procedures for disciplinary action stipulated in the Human Resources Operations Manual / Code of Ethics and Conduct.

7.0 REVIEW OF THE POLICY

This Policy shall be reviewed by the Audit Committee as and when deemed necessary.

8.0 REGISTER AND QUARTERLY REPORTING

A complete register of all reports received by the Group pursuant to this Whistleblowing Policy, together with details of the investigation conducted (if any) shall be properly maintained by the Group and presented to the Audit Committee.

The register shall be made available for inspection at any time by the internal and external auditors as well as any regulatory authorities, provided that the identity of the Whistleblowers shall be protected and redacted at all times, unless the Whistleblower has consented in writing to the disclosure of his / her identity or if such disclosure is required by law, a court of competent jurisdiction or a lawful authority.

Reviewed and updated on 1st of April 2022.