ECOSYS (MALAYSIA) BERHAD

(Registration No. 202301024280 (1518203-H))

WHISTLEBLOWING POLICY

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1.0 INTRODUCTION

EcoSys (Malaysia) Berhad ("**Company**") and its subsidiaries (collectively referred to as the "**Group**") are committed to upholding strong ethical values and the highest standard of work ethics for all Directors, employees and stakeholders of the Group in line with good corporate governance and business integrity practices.

In line with this commitment, the Group has adopted this Whistleblowing Policy ("**Policy**") to provide an avenue for its Directors, employees and stakeholders to raise genuine concerns or report any suspected or known wrongdoing, improper conduct, corruption, or instances of fraud, waste or abuse involving the resources of the Group, its Directors or its employees. The Group expects all employees and those it deals with to come forward and voice any serious concerns they may have regarding the Group's operations. It is recognised that most cases will need to proceed on a confidential basis and all employees of the Group can raise concerns without fear of victimisation, retaliation, discrimination or disadvantage.

This Policy applies to all employees of the Group including but not limited to permanent staff, contract staff, independent contractors, secondees, contractors and agency workers, as well as all agents, vendors, suppliers, consultants and customers of the Group.

2.0 OBJECTIVE

The objectives of this Policy are to:

(a) encourage employees to feel confident in raising serious concerns and to question or act on concerns regarding practices within the Group;

(b) promote the reporting of any suspected fraud, corruption, conduct, misconduct or inappropriate behaviour within the Group;

(c) provide an avenue for individuals to raise concerns about improper conduct and ensure they receive feedback on any actions taken;

(d) offer protection to whistleblowers from possible reprisals or victimisation, provided they have made disclosures in good faith and with reasonable belief; and

(e) ensure appropriate and fair disciplinary actions, all measures taken against the alleged wrongdoers will be impartial and without prejudice.

Overall, this Policy reinforces the Group's commitment to accountability, integrity and transparency across all business operations.

3.0 TYPES OF IMPROPER CONDUCT

The following actions and behaviors, among others, are considered violations under this Policy:

(a) **Fraud and Misappropriation of Funds or Assets**: Any act of deception or misconduct involving the improper use, mismanagement or diversion of the Group's financial or physical resources.

(b) **Bribery, Corruption or Blackmail**: Engaging in or facilitating corrupt practices, including offering, giving, receiving or soliciting anything of value to influence a decision or act.

(c) **Violation of the Group's Code of Conduct, Procedures or Policies**: Any breach of the Group's established ethical guidelines, procedures or company policies.

(d) **Improper or Unethical Conduct or Behaviour**: Actions that do not meet the accepted standards of integrity, honesty, or professionalism within the workplace.

(e) **Conflict of Interest**: Situations where personal interests conflict with the interests of the Group, potentially leading to compromised decision-making.

(f) **Theft or Embezzlement of Fund or Assets**: Stealing or unlawfully taking the Group's financial or material assets for personal gain.

(g) **Abuse of Power or Position**: Misuse of authority or influence for personal gain or to exploit or oppress others.

(h) **Breach of Confidentiality**: The unauthorised disclosure of proprietary or sensitive information pertaining to the Group or any of its stakeholders.

(i) **Criminal Breach of Trust**: A violation of trust, where an individual entrusted with property or responsibility acts dishonestly or improperly.

(j) **Failure to Comply with Legal Obligations or Breach of Internal Control**: Non-compliance with legal regulations, laws, or the Group's internal policies and control mechanisms.

(k) **Endangerment of Health and Safety**: Any conduct that places the health, safety or well-being of the Group's employees or others at risk.

(l) **Sexual Harassment or Physical Abuse**: Any form of unwelcome sexual advances, inappropriate behaviour or physical abuse against any individual within or outside the workplace.

(m) **Criminal Offence or Breach of Law**: Conduct that violates any law or results in criminal liability for the individual or the Group.

(n) **Other Unethical Conduct**: Any other behaviour or practices not aligned with the ethical principles and integrity expected by the Group.

The above list is not exhaustive. Whistleblowers should act in good faith with reasonable grounds for their concerns. False or malicious reports may result in disciplinary action.

4.0 PROTECTION TO WHISTLEBLOWER

The Group recognizes that reporting misconduct can be challenging. All concerns raised in good faith will be treated with strict confidentiality and whistleblowers will be protected from retaliation, victimization or any adverse consequences. The Group is committed to ensuring that individuals who disclose genuine concerns are not subject to any form of harassment, discrimination or disadvantage.

(a) Confidentiality

The identity of the whistleblower will be kept confidential unless disclosure is required by law or deemed necessary to facilitate the investigation. All reports will be handled discreetly, and investigations will be conducted promptly and objectively. However, the whistleblower may be required to act as witness if necessary.

(b) Protection and Immunity

Whistleblowers who report concerns in good faith will not face any form of retaliation, disciplinary action or adverse employment consequences. This protection, however, does not extend to those who make false, frivolous or malicious reports. Such actions will be treated as misconduct and may result in disciplinary measures.

(c) Revocation of Protection

The Group reserves the right to revoke whistleblower protection if the disclosure is found to be false, made in bad faith or in violation of this Policy. Written notice will be provided to the whistleblower, and the Group may take appropriate legal or disciplinary action where warranted.

5.0 WHISTLEBLOWING CHANNEL

5.1 Reporting Procedures

(a) Any concerns should be reported to the Chairman of the Audit and Risk Management Committee ("**ARMC**") by completing the information required in the Whistleblowing Report Form annexed herewith as **Appendix A**. If the matter involves the ARMC Chairman, the whistleblower should report directly to the Chairman of the Board of Directors ("**Board**").

(b) The whistleblower must demonstrate reasonable grounds for their concerns. However, substantial evidence or proof beyond reasonable doubt is not required at the time of disclosure. If the whistleblower has reasonable grounds to suspect that misconduct is occurring or about to occur, they are encouraged to raise these genuine concerns promptly.

(c) Upon receipt of the report, initial inquiries will be conducted to determine whether an investigation is warranted. The ARMC Chairman will assess the seriousness and sensitivity of the matter and, if necessary, to assign the relevant management personnel or investigator to conduct the investigation. The progress of the investigation will be promptly reported to the ARMC. Some concerns may be resolved through agreed actions without the need for a formal investigation.

(d) Upon completion of the investigation, the ARMC will review the investigation report and make recommendation to the Board.

(e) Actions approved by the Board will be carried out accordingly and steps will be taken to prevent a recurrence of similar situations. The whistleblower will be informed of the outcome of the investigation or the resolution of the complaint.

5.2 Submission Methods

(a) <u>Via Post</u>

Sealed envelope marked "**Strictly Private & Confidential**" and addressed to the **Chairman of Audit and Risk Management Committee.**

(b) <u>Via E-mail</u>

E-mail the complaint letter to the ARMC Chairman at the designated email address at Hr-Malaysia@ecosysgrp.com.

6.0 ANONYMOUS WHISTLEBLOWER

(a) The Group recognises that the provision of anonymity to any individual and/or employee who willingly comes forward to report a suspicion of fraud is key to encouraging such reporting.

(b) However, to prevent false malicious reporting, poison letters and abuse of the reporting channel, all whistleblowers must identify themselves and provide contact information in their reports. This information will be useful for the following purposes:

(i) to enable the independent investigation panel to verify the report and to obtain further information, if necessary;

(ii) to facilitate further investigations by auditors or authorities where the identity of the informer is required by law; and

(iii) to enable communication of investigation outcome to the whistleblower.

(c) The Group will treat all reports and information received as confidential and will disclose them only on a strictly "need-to-know" basis for the purpose of conducting the investigation.

(d) The ARMC Chairman shall have the ultimate discretion to determine whether the identity of the whistleblower should be disclosed. If the disclosure is deemed necessary, consent from the whistleblower will be obtained prior to releasing any identifying information.

(e) The same principles shall apply if the whistleblower is not an employee of the Group.

7.0 REVIEW OF THE POLICY

The Board will periodically review and update this Policy to ensure its relevance, effectiveness and alignment with the Group's objectives, practices and current laws and regulations. Any amendments to this Policy shall be approved by the Board.

This Policy is made available on the Company's website.

8.0 APPROVAL

This Policy was reviewed and approved by the Board of Directors of the Company on **26 November 2025.**

ECOSYS (MALAYSIA) BERHAD
[Registration No. 202301024280 (1518203-H)]
(Incorporated in Malaysia)

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"STRICTLY PRIVATE & CONFIDENTIAL"

This form is for the use of employees and external parties who wish to report any concerns in accordance with the Group's Whistleblowing Policy. All reports will be treated in strict confidence. False or malicious reporting may result in disciplinary or legal action. Please complete the form with as much detail as possible to assist in the investigation.

WHISTLEBLOWING REPORT FORM

1. Personal Information *(Optional)*
(Note: Whistleblowers are encouraged to provide their contact information to facilitate the investigation. Anonymous reports will not be entertained.)

- Full Name :
- Position :
- Phone Number :
- Email Address :
- Address :

2. Nature of Concern
Type of Concern (*Please select the most appropriate category*):

☐ Fraud
☐ Misappropriation of Funds/Assets
☐ Bribery or Corruption
☐ Breach of Confidentiality
☐ Harassment/Discrimination
☐ Health and Safety Violations
☐ Other (Please specify):

3. Details of the Reported Contravention

- Date of Incident :
- Time of Incident :
- Location of Incident :
- Person(s) Involved :
- Details of the Contravention :

(Please provide a detailed description of the event, including names of individuals involved, dates, and any evidence that supports your report)

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WHISTLEBLOWING REPORT FORM *(Cont'd)*

3. Details of the Reported Contravention *(Cont'd)*

- Are there any witnesses?

☐ Yes
☐ No

If yes, please provide their names and contact information:

4. Supporting Evidence

Please provide any documents or evidence that may support your report (*e.g., emails, photographs, financial records, etc.*):

- Description of Evidence :
- Attached Supporting Documents :

☐ Yes
☐ No

Declaration

I hereby declare that all the information provided herein is true and to the best of my knowledge and I will ensure that my participation in this matter remains confidential. I understand that the Group will use the information and materials provided during the investigation process.

____
Name:
NRIC No.:
Date: