

ALCOM GROUP BERHAD WHISTLE BLOWER PROTECTION CODE

INTRODUCTION

This document outlines the systematic process for ALCOM Group Berhad (AGB) policy and standard of procedure on Whistle Blower Protection Code. This code is a crucial element of AGB's commitment to integrity and transparency. It is designed to safeguard the ethical standards that underpin the corporate culture and operational success.

Foreword by President and Group CEO

At ALCOM Group Berhad (AGB), we are committed to maintaining the highest standards of integrity and transparency in all that we do. This commitment is the foundation upon which our reputation and success are built. A vital part of this commitment is ensuring that every member of our team feels empowered and protected to speak up when they encounter or suspect misconduct.

The Whistle-blower Protection Code is more than a set of policies; it is a clear declaration of our values and a testament to our dedication to ethical conduct. It embodies our promise to listen and respond to concerns about wrongdoing without fear of retaliation or harm.

As President and CEO, I want to reassure each of you that your voice is essential. When you come forward with concerns, you are not just helping to address a potential issue; you are actively participating in upholding our corporate integrity. This Code ensures that when you make the brave decision to report wrongdoing, you are supported, protected, and respected throughout the process.

We have designed this Code to provide clear, accessible channels for reporting and a guarantee that all concerns will be investigated thoroughly and impartially. More importantly, it includes strong protections against retaliation, ensuring that no one will suffer for doing the right thing.

I urge all employees, contractors, and partners to familiarise themselves with this Code and to use it as intended—to safeguard our company, our colleagues, and our collective future. Your willingness to speak up is crucial to our ongoing success and our ability to maintain a workplace where integrity leads our way.

Thank you for your commitment to making AGB a model of ethical excellence and for your trust in our process. Together, we can ensure that AGB continues to operate not just with profitability but with profound respect for the principles that define us.

Heon Chee Shyong

President and Chief Executive Officer

ALCOM Group Berhad

Table of Content

INTRODUCTION	1
FOREWORD BY PRESIDENT AND GROUP CEO	2
1. EXECUTIVE SUMMARY	5
2. PRINCIPLES OF WHISTLE-BLOWING	7
3. PROTECTION MEASURES	9
4. REPORTING MECHANISMS	11
5. INVESTIGATION PROCESS	13
6. CORRECTIVE ACTIONS AND REMEDIES	15
7. TRAINING AND AWARENESS	17
8. REVIEW AND IMPROVEMENT	18

1. Executive Summary

1.1. Objectives of the Code

The Whistle-blower Protection Code at ALCOM Group Berhad (AGB) is designed with specific objectives that are fundamental to the integrity and ethical operation of our organization. These objectives guide our actions and ensure that our commitment to ethical conduct is upheld by everyone associated with AGB.

Encouragement of Reporting: The primary goal of this Code is to encourage the reporting of unethical or illegal behavior within the organization. We aim to create an environment where all members of the AGB family feel comfortable and supported in bringing forward concerns about misconduct. This openness is crucial for maintaining transparency and addressing issues before they escalate.

Protection of Whistle-blowers: Protecting those who come forward is central to the effectiveness of this Code. We guarantee that whistle-blowers will be safeguarded from retaliation, intimidation, harassment, or any adverse employment action as a result of their decision to report wrongdoing. This protection ensures that individuals can speak up without fear, knowing that their rights and well-being will be defended.

1.2. Scope and Applicability

The Whistle-blower Protection Code applies broadly to ensure comprehensive coverage and support within ALCOM Group Berhad.

All Employees: This includes full-time, part-time, temporary, and freelance staff across all levels and departments within AGB. Every employee is covered under this Code and is encouraged to report any concerns about misconduct.

Contractors and Suppliers: External partners, including contractors and suppliers, are also subject to the provisions of this Code. Their interactions with AGB and their role in our operations make their compliance essential for maintaining our ethical standards.

Other Stakeholders: The Code extends to other stakeholders who may have insights into our operations, such as clients, investors, and community members. We value the perspectives and reports from these groups, as they contribute to our comprehensive understanding and management of ethical risks.

By establishing clear objectives and defining its scope, the Whistle-blower Protection Code ensures that ALCOM Group Berhad remains a leader in ethical business practices, fostering a culture of integrity and accountability that benefits all associated with our organisation.

2. Principles of Whistle-blowing

At ALCOM Group Berhad (AGB), the principles of whistle-blowing are foundational to our approach to ethical reporting and are designed to uphold the integrity of our operations. These principles guide our actions and ensure that every report is treated with the seriousness and respect it deserves.

2.1. Transparency and Honesty

AGB emphasizes the critical role of honesty in the whistle-blowing process. We expect all reports to be made in good faith, with accurate and complete information to the best of the reporter's knowledge. Honesty in reporting is vital for addressing issues effectively and maintaining the trust of all involved.

Commitment to Transparency: AGB is dedicated in handling all reports with the highest level of transparency. This means that every step of the investigation and resolution process will be conducted openly, within the bounds of confidentiality and privacy requirements. We ensure that whistle-blowers and all relevant parties are informed of the progress and outcomes where appropriate, fostering an environment of open communication and mutual trust.

2.2. Confidentiality

Protection of Identity: AGB understands that the protection of whistle-blowers' identities is essential to encourage the reporting of unethical or illegal behaviour. We are committed to maintaining confidentiality and will fully protect the identity of whistle-blowers possible. This includes limiting access to information about the report to those directly involved in the investigation and resolution process.

Encouragement to Report: By assuring confidentiality, AGB aims to create a safe environment where employees and other stakeholders feel secure in coming forward with their concerns. This assurance helps to eliminate fear of retaliation or negative

consequences, encouraging a proactive approach to identifying and addressing issues.

Through these principles of transparency, honesty, and confidentiality, ALCOM Group Berhad (AGB) ensures that the whistle-blowing process is robust, fair, and effective, supporting our overarching commitment to ethical conduct and accountability.

3. Protection Measures

At ALCOM Group Berhad (AGB), we are committed to ensuring that individuals who report misconduct are protected and supported throughout the process. Our protection measures are designed to uphold the safety and well-being of whistle-blowers, reinforcing our commitment to ethical practices and transparency.

3.1. No Retaliation

Prohibition of Retaliation: AGB strictly prohibits any form of retaliation against whistle-blowers. This includes harassment, demotion, dismissal, or any adverse employment action that could result from making a report. We recognize that protecting whistle-blowers from retaliation is essential to maintaining an open and honest reporting environment.

Enforcement and Penalties: Any employee or stakeholder who engages in retaliation against a whistle-blower will face disciplinary action, which may include termination of employment, depending on the severity of the offense. These measures ensure that our anti-retaliation policy is not merely a statement, but a practice enforced with rigor and fairness.

3.2. Support and Assistance

Counselling Services: Understand that reporting misconduct can be stressful. Therefore, AGB provides access to counselling services to support the emotional and psychological well-being of whistle-blowers. These services are confidential and designed to help individuals navigate the challenges they may face during and after the reporting process.

Legal Advice: When necessary, whistle-blowers may have access to legal advice to understand their rights and the protections available to them under the law. AGB ensures that these services are accessible to help whistle-blowers make informed decisions and feel secure in their actions.

Guidance and Communication: AGB offers guidance throughout the reporting and investigation process. Whistle-blowers are kept informed of the progress of their report and any subsequent actions, fostering a transparent process that respects their contribution and courage.

By implementing these protection measures, ALCOM Group Berhad (AGB) demonstrates its unwavering commitment to supporting and safeguarding whistle-blowers. This approach not only encourages ethical reporting but also strengthens the overall integrity and trust within our organization.

4. Reporting Mechanisms

At ALCOM Group Berhad (AGB), we ensure that multiple channels are available for employees and other stakeholders to report unethical or illegal activities. These mechanisms are designed to be accessible and secure in encouraging open communication and prompt reporting.

4.1. Channels for Reporting

Dedicated Email Addresses: For those who prefer digital communication, we provide a dedicated email address where reports can be sent directly. This email is monitored by the Compliance Department to ensure timely and appropriate responses.

For reports regarding Senior Management, email can be sent to the Audit Committee Chairman, Ms Lam Voon Kean at (lamvoonkean@alcom.com.my). For reports regarding Managers, Executives and Non-Executives, email can be sent to CEO, Mr Heon Chee Shyeong at (chee-shyong.heon@alcom.com.my).

Direct Communication with Designated Officers: Employees and stakeholders can also choose to report directly to designated officers. These officers are trained to handle reports with the utmost sensitivity and professionalism.

For reports regarding Senior Management, communication can be made with the Audit Committee Chairman, Ms Lam Voon Kean. For reports regarding Managers, Executives and Non-Executives, communication can be made with the CEO, Mr Heon Chee Shyeong.

4.2. Guidance on Reporting

To facilitate a thorough and effective investigation, it is important for reports to be as detailed and clear as possible. When making a report, please consider including the following information:

- **Nature of the Concern:** Describe the issue or behaviour that you believe is unethical or illegal. Be as specific as possible about what was observed or experienced.
- **Individuals Involved:** If known and appropriate, identify the individuals involved in the misconduct. This information helps to direct the investigation appropriately.
- **Location and Time:** Provide details about where and when the incident occurred, as these details can be crucial for verifying the events.
- **Evidence or Documentation:** If available, include any evidence or documentation that supports your report, such as emails, photographs, or records. Please ensure that obtaining or sharing this evidence complies with legal and ethical standards.
- **Contact Information:** While you may choose to remain anonymous, providing contact information can assist the investigation team if further information or clarification is needed. Rest assured, any provided contact details will be kept confidential in line with our protection measures.

By using these reporting mechanisms and providing detailed information, you help AGB to address and rectify unethical or illegal activities effectively, maintaining the integrity and trust that are central to our values and operations.

5. Investigation Process

At ALCOM Group Berhad (AGB), we ensure that every report of unethical or illegal activity is treated with the seriousness it deserves. Our investigation process is designed to be thorough, impartial, and effective, ensuring that all concerns are addressed appropriately and in a timely manner.

5.1. Initial Assessment

Receipt and Categorization: Upon receiving a report, the first step is to document the time, date, and nature of the report. The compliance department or designated ethics officer then assesses the report to categorize it based on severity, urgency, and potential impact on the organization.

Determination of Action: Based on the initial assessment, a decision is made regarding the necessary immediate actions. This could include involving legal counsel, notifying senior management, or implementing temporary measures to mitigate any ongoing risk.

Assignment of Investigation Team: The appropriate investigative team is assigned based on the nature of the report. This team could include internal auditors, HR professionals, legal experts, or external consultants, depending on the specifics of the case.

5.2. Investigation Procedures

Collection of Evidence: The investigation team collects all relevant evidence, which may include documents, emails, electronic records, and physical evidence. Interviews with witnesses and involved parties are conducted to gather a comprehensive view of the situation.

Analysis and Evaluation: The collected evidence and testimonies are analysed to determine the facts of the case. The team evaluates the information against AGB's

policies, ethical standards, and applicable laws to ascertain any violations or misconduct.

Documentation of Findings: A detailed report is prepared, documenting the investigative process, findings, and recommendations for corrective actions. This report ensures transparency and serves as a record for future reference.

Communication of Outcomes: The findings are communicated to the relevant decision-makers within AGB, including senior management and the board of directors, if necessary. In cases where it is appropriate and without breaching confidentiality, the outcome may be communicated to the whistleblower to close the loop on their report.

Corrective Actions and Follow-Up: Based on the findings, corrective actions are implemented to address the issues uncovered. These may include disciplinary measures, policy revisions, or additional training. Follow-up is conducted to ensure that the corrective actions have been effective and to prevent recurrence of similar issues.

By adhering to this structured and transparent investigation process, ALCOM Group Berhad (AGB) ensures that all reports are handled with the integrity and diligence they require, maintaining the trust and confidence of our employees and stakeholders in our commitment to ethical conduct.

6. Corrective Actions and Remedies

At ALCOM Group Berhad (AGB), we are committed to responding to all substantiated reports of unethical or illegal behaviour with appropriate corrective actions. Our approach is designed to ensure that justice is served, integrity is restored, and measures are taken to prevent future violations.

6.1. Response to Findings

Disciplinary Actions: When an investigation confirms misconduct or a breach of policy, AGB will take disciplinary actions against the offenders, tailored to the severity of the violation. These actions may include written warnings, suspension, demotion, or termination of employment. In cases involving illegal activity, referral to law enforcement or regulatory authorities may also be necessary.

Corrective Measures: Beyond addressing individual misconduct, AGB implements corrective measures to prevent similar issues in the future. This may involve revising policies and procedures, enhancing training programs, or making structural changes to improve oversight and accountability.

Restoration and Compensation: Where applicable, efforts will be made to restore any losses or damages caused by the misconduct. This may include financial restitution or other forms of compensation to the affected parties.

Transparency and Communication: AGB believes in the importance of transparency in the aftermath of an investigation. While respecting confidentiality and privacy, the organization will communicate the outcome and corrective actions taken to relevant stakeholders to reinforce our commitment to ethical behavior.

6.2. Protection for the Whistle-blower

Confidentiality: AGB fully maintains the confidentiality of the whistle-blower's identity possible throughout the investigation and beyond. Access to information about the whistle-blower is strictly limited to those who need to know to conduct the investigation effectively.

No Retaliation: AGB enforces a strict no-retaliation policy to protect whistle-blowers from any form of reprisal, including but not limited to harassment, demotion, or dismissal. Any attempt at retaliation is met with immediate disciplinary action.

Support and Counselling: Recognizing the emotional and psychological stress that can accompany whistle-blowing, AGB provides access to counselling and support services for whistle-blowers. These services help individuals cope with the challenges and ensure they continue to feel valued and supported within the organization.

Legal Protection: Where necessary, AGB will provide legal support or advice to whistle-blowers, particularly in cases where their report leads to legal proceedings, or they face undue legal challenges as a result of their actions.

Through these corrective actions and protective measures, ALCOM Group Berhad (AGB) demonstrates its unwavering commitment to ethical conduct and the well-being of those who help uphold these standards. This approach ensures that our organization remains a place where integrity leads and individuals are empowered to act in accordance with our values.

7. Training and Awareness

At ALCOM Group Berhad (AGB), we recognize that effective implementation of the Whistle-blower Protection Code depends not only on robust policies but also on comprehensive training and awareness for all employees and stakeholders. This ensures everyone is informed about their rights and responsibilities and understands the importance of the whistle-blowing process.

7.1. Education Programs

Regular Training: AGB commits to providing regular, comprehensive training programs for all employees on the Whistle-blower Protection Code. Training is designed to be interactive and engaging, encouraging questions and discussions to deepen understanding.

Onboarding and Refresher Courses: New employees receive this training as part of their onboarding process, ensuring they are aware of these policies from their first day. Existing employees are required to complete refresher courses periodically to stay updated on any changes to the code and to reinforce the importance of these policies.

7.2. Awareness Campaigns

Internal Communications: AGB uses various channels of internal communication, such as newsletters to keep whistle-blowing policies and protections visible and top-of-mind.

Feedback and Engagement: AGB encourages employees to provide feedback on the training and awareness programs. This feedback is used to continuously improve these initiatives, ensuring they are effective and resonate with employees.

By educating and engaging our employees, we foster an environment where ethical conduct is the norm and everyone is equipped to act when necessary.

8. Review and Improvement

At ALCOM Group Berhad (AGB), we understand that the effectiveness of our Whistle-blower Protection Code depends on our ability to adapt and respond to evolving challenges and feedback. Continuous evaluation and improvement are essential to maintaining the integrity and relevance of our policies and practices.

8.1. Continuous Evaluation

Regular Reviews: The Whistle-blower Protection Code is subject to regular reviews to ensure it remains current with legal, regulatory, and societal changes. These reviews are conducted at least annually or more frequently if significant issues or changes in the external environment necessitate adjustments.

Cross-Functional Review Team: The review process is managed by a cross-functional team that includes representatives from Compliance, Legal, Human Resources, and other relevant departments. This team assesses the effectiveness of the Code, identifies areas for improvement, and proposes updates based on their findings.

Incorporation of Changes: The review process involves not just identifying necessary changes but also implementing these updates effectively. Changes may include adjustments to policies, enhancement of protection measures, or updates to reporting mechanisms. All changes are thoroughly documented and communicated across the organization.

8.2. Feedback Mechanism

Open Channels for Feedback: AGB encourages ongoing feedback from all employees and stakeholders regarding the Whistle-blower Protection Code. This feedback is invaluable in assessing the Code's effectiveness and identifying areas for improvement.

Surveys and Focus Groups: Regular surveys and focus groups are conducted to gather insights and perceptions about the whistle-blowing process and the protections in place. This direct feedback helps AGB understand the practical impact of the Code on the workforce and adjust practices accordingly.

Feedback Integration: Feedback from employees and stakeholders is carefully reviewed and considered in the continuous improvement process. Suggestions that lead to improvements in the Code are acknowledged and, where appropriate, the contributors are informed about how their input has shaped policy enhancements.

By maintaining a commitment to continuous evaluation and actively seeking and integrating feedback, ALCOM Group Berhad (AGB) ensures that our Whistle-blower Protection Code is a dynamic, effective tool in promoting transparency, integrity, and accountability within our organization.