

WHISTLE-BLOWING POLICY

1. INTRODUCTION

All employees, customers and suppliers and any third parties having any dealings with the Group (“stakeholders”) are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance and other malpractices at the earliest opportunity, and in an appropriate way.

The whistle-blowing policy of Cabnet Holdings Berhad (“Cabnet” or “the Company”) is designed to:

- a) Support the company’s values;
- b) Ensure stakeholders can raise concerns without fear of reprisals and safeguard such person’s confidentiality;
- c) Protect a whistle-blower from reprisal as consequence of making a disclosure; and
- d) Provide a transparent and confidential process for dealing with concerns.

This policy covers possible improprieties in matters of financial reporting, and amongst others, the following:

- a) Fraud;
- b) Corruption, bribery or blackmail;
- c) Criminal offences;
- d) Failure to comply with a legal or regulatory obligation;
- e) Miscarriage of justice;
- f) Spreading malicious rumours about the Group;
- g) Unauthorized disclosure of the Group’s confidential information without prior approval;
- h) Endangerment of an individual’s health and safety; and
- i) Concealment of any, or a combination, of the above.

2. PRINCIPLES

The principles underpinning the Policy are as follows:

- a) internal procedures to facilitate necessary whistle-blowing, in a timely and responsible manner, are in place and made known to all employees of the company;
- b) all disclosures will be treated fairly and properly, and addressed in an appropriate and timely manner;
- c) the Company will not tolerate harassment or victimisation of anyone raising a genuine concern;
- d) the identity and personal information of the whistle-blower will be protected and kept confidential, unless the individual agrees otherwise or unless otherwise required by law, court or regulatory authority;

- e) the whistle-blower and the alleged wrongdoer will be treated fairly. The wrongdoer will be informed of the status of his disclosure and the alleged wrongdoer will be given an opportunity to respond to all allegations at an appropriate time (not necessarily at the start, or during, the investigation);
- f) personal information, including the identity, of the whistle-blower and the alleged wrongdoer shall only be revealed on a 'need-to-know' basis or if required by law, court or regulatory authority; and
- g) the company will ensure no one will be at risk of suffering some form of reprisal as a result of raising a concern even if the individual is mistaken. The company, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue.

3. COVERED CONCERNS

A disclosure relating to, but not limited to, either of the following concerns or wrongdoings by any person in the conduct of the business shall be reported:

- a) corruption, bribery and fraud;
- b) criminal offence or any breach of the laws of Malaysia;
- c) acceptance of gifts/ favour beyond the threshold allowed by the company;
- d) misuse and/or misappropriation of the company's funds or assets;
- e) impropriety (including financial and operational, etc.) within the company;
- f) gross mismanagement within the company (including serious potential breach to the interest of society and environment);
- g) breach of code of ethics of the company, including sexual, physical or other abuse of human rights; and
- h) act or omission jeopardising the health and safety of the company's employees or the public.

4. ACTING IN GOOD FAITH

The Company expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it, are sustainably true and not acting for personal gain. Any anonymous whistle-blower will not be entertained.

5. REPORTING PROCEDURE

If any stakeholder believes reasonably and in good faith that malpractices exist in the Company, the stakeholder should report this immediately to the head of department.

However, if for any reason the stakeholder is reluctant to do so, then the stakeholder should report the concerns to the Audit and Risk Management Committee ("ARMC") Chairman.

Employees concerned about speaking to another member of staff can communicate, in confidence, to the ARMC Chairman by email his/her concern to the ARMC Chairman. Any anonymous disclosure will not be entertained. However, the ARMC Chairman reserves his/her right to investigate into any anonymous disclosure.

These concerns will be managed by the ARMC Chairman and he/she shall have the right to decide whether to inform the Management or the Board of Directors or relevant enforcement authority(ies)(if the ARMC Chairman concluded that such incidents to be reported, based on the facts gathered), depending on the seriousness of the reported incident(s) and on need-to-know basis, without revealing the identity of the whistle-blower. The ARMC Chairman, at the cost to be borne by the Company, shall have the right and authority(ies) to decide on the next course of actions with the advice of the external professionals or experts, if required.

Whistle-blowers' identity will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the whistle-blower raising the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the whistle-blower concerned as to whether and how the matter can progress further.

6. CONSEQUENCES OF WRONGDOING OR WRONGFUL DISCLOSURE

If the Person (i.e. the whistle-blower) has, or is found to have:

- a) committed a wrongdoing;
- b) participated in the improper conduct, wrongdoing, corruption, fraud and/or abuse;
- c) taken serious risks which would likely cause a wrongdoing to be committed;
- d) involves frivolous and vexatious whistleblowing disclosures;
- e) wilfully or maliciously made the disclosure, knowing or believing the information was untrue or false;
- f) made a disclosure not in accordance with the requirements of this policy (for instance, dishonest, mischievous or malicious complaints); or
- g) participated or assisted in any process pursuant to this policy otherwise than in good faith,

the corrective actions to be taken against that Person will be determined by the ARMC Chairman and the Executive Director, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

Any attempt to retaliate, victimize or intimidate against anyone (whistle-blower) making report in good faith is a serious violation of the Policy and shall be dealt with serious disciplinary actions and procedures.

7. PROTECTION

The identity and personal information of the whistle-blower will be protected and kept confidential. The abovementioned identity and personal information will not be disclosed without the whistle-blower prior consent unless, required by law, court or regulatory authority. Further, in the event the whistle-blower will be protected from reprisals, as a consequence of his/her disclosure:

- a) action causing injury, loss or damage;
- b) intimidation, victimisation and harassment;
- c) interference with the whistle-blower's lawful employment or livelihood (including, discrimination, demotion, termination of employment, disciplinary actions); and

d) any threats in relation to the above.

If a whistle-blower reasonably believes that he/she is being subjected to reprisal, as a consequence of whistle-blowing, he/she may consult or report to the ARMC Chairman.

8. REVOCATION OF POLICY & PROTECTION

The protection stated in Section 7 above shall be revoked by the Group if:

- a) The whistle-blower himself/herself has participated in the improper conduct, wrongdoings, corruption, fraud and/or abuse;
- b) The whistle-blower made his/her disclosure without good faith;
- c) The disclosure was frivolous or vexatious; or
- d) The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistle-blower himself/herself.

9. ADMINISTRATION

This Policy is administered by the ARMC with the assistance of the Management and overseen by the Board of Directors.

Contact persons:

Designation	Name	Email address
ARMC Chairman	Mr Vincent Wong Soon Choy	v_invest@hotmail.com
ARMC Member	Mr Abdul Mutalib Bin Idris	mutalib.amiri@yahoo.com
Chief Executive Officer	Dato' Jeffrey Lai Jiun Jye	jeffrey.lai@cabnet.asia

This Whistle-Blowing Policy was approved and adopted by the Board on 23 February 2018.

This Whistle-Blowing Policy was last reviewed and revised on 28 April 2025.