

JAG BERHAD

[Registration No. 199701023733 (439230-A)]
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

(Adopted w.e.f. 22 February 2019)

1. Introduction

Practice 3.2 of the Malaysian Code on Corporate Governance ("**MCCG**") stipulates for the Board to establish, review and together with management implement policies and procedures on whistleblowing.

In addition, Guidance 3.2 of the MCCG stipulates that the Board should encourage employees to report genuine concerns in relation to breach of a legal obligation (including negligence, criminal activity, breach of contract and breach of law), miscarriage of justice, danger to health and safety or to the environment and the cover-up of any these in the workplace.

The Board should ensure that its Whistleblowing Policy ("**Policy**") sets out avenues where legitimate concerns can be objectively investigated and addressed. Individuals should be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

2. Scope of the Policy

2.1 This Policy covers possible improper conduct such as:-

- (a) Fraud;
- (b) Corruption, bribery or blackmail;
- (c) Criminal offences;
- (d) Theft or embezzlement;
- (e) Abuse of power;
- (f) Conflict of interest;
- (g) Misuse of the group's property;
- (h) Insider trading;
- (i) Money laundering;
- (j) Breach of legal obligation (including negligence, criminal activity, breach of contract and breach of law);
- (k) Miscarriage of justice;
- (l) Endangerment of an individual's health and safety or of the environment; and
- (m) Concealment or cover-up of any of the above.

2.2 The improper conduct above is not exhaustive and includes any other act or omission, which if proven, will constitute an act of misconduct under *Code of Ethics and Conduct* of the Company, disciplinary offence under the relevant policies and procedures of the Company or criminal offence under relevant legislations in force.

2.3 The Company expects all parties to act in good faith with a reasonable belief that the information and allegations are substantially true.

2.4 If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

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- 2.5 All confidential reporting or disclosures by a whistleblower are to be directed to the designated person in accordance with the procedures under this Policy.
- 2.6 The Policy is not intended as a means for employees to pursue personal grievances which should be referred directly with their immediate superiors.

3. Protection to Whistleblower

- 3.1 The Company will take all reasonable steps to protect the confidentiality of identity of a whistleblower, to the extent reasonably practicable and will adhere to any statutory requirements in force.
- 3.2 Any employee of the Company who whistleblows will also be protected against any adverse and detrimental actions in reprisal for disclosing any improper conduct committed or about to be committed within the Company and its Group of Companies ("**the Group**"), to the extent reasonably practicable, provided that the disclosure is made in good faith.
- 3.3 Such protection will continue notwithstanding that the investigation later reveals that the whistleblower is mistaken as to the facts, rules and procedures of improper conduct.
- 3.4 The whistleblower remains liable for his/her own conduct and is responsible to ensure that disclosure is made in good faith and free from any malicious intent. The Company does not have the power to offer any person immunity against prosecution in the criminal jurisdiction.
- 3.5 The Company may revoke the protection accorded to a whistleblower under the following circumstances, amongst others:-
 - (a) the whistleblower participated in the improper conduct;
 - (b) the whistleblower wilfully discloses a false statement;
 - (c) the disclosure is made with malicious intent;
 - (d) the disclosure is frivolous or vexatious; or
 - (e) the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

4. Anonymous Whistleblower

- 4.1 The Company will not entertain any anonymous disclosure. The person who wishes to whistleblow any improper conduct within the Group is required to disclose his/her name, identity number and contact number. Nonetheless, these identity details will be kept confidential to accord protection to the whistleblower.
- 4.2 However, the Company reserves its right to investigate into any anonymous disclosure.

5. Reporting procedures

- 5.1 All disclosures are to be channelled in accordance with the procedures provided herein.

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5.2 Disclosures can be made in strict confidential manner, marked "**Confidential**" and "**Strictly to be opened by addressee only**" to:-

- For matters relating to financial reporting, unethical or illegal conduct, once can report directly to the following designated persons:-

AC Chairman

Mr. Hong Cheong Liang
D65-3A, Block D, Jaya One,
72A, Jalan Universiti,
46200 Petaling Jaya,
Selangor Darul Ehsahn
Email: hcl.cpa@gmail.com

- For employment-related concerns, one can report directly to the following designated persons:-

(i) Executive Director (JAG Group)

Datin Stacey Tan
D65-3A, Block D, Jaya One,
72A, Jalan Universiti,
46200 Petaling Jaya,
Selangor Darul Ehsahn
Email: stacey@jagb.com.my

(ii) Executive Director (TWM Division)

Dato' Ng Meow Giak
D65-3A, Block D, Jaya One,
72A, Jalan Universiti,
46200 Petaling Jaya,
Selangor Darul Ehsahn
Email: nigel@jaringmetal.com

(iii) Head of Human Resources

Mr. Ng Yaw Long
D65-3A, Block D, Jaya One,
72A, Jalan Universiti,
46200 Petaling Jaya,
Selangor Darul Ehsahn
Email: tony@jaringmetal.com

- For any concerns from the shareholders/stakeholders, one can email to the following designated Director:-

Non-Independent Non-Executive Director

Mr. Roy Thean Chong Yew
D65-3A, Block D, Jaya One,
72A, Jalan Universiti,
46200 Petaling Jaya,
Selangor Darul Ehsahn
Email: rthean@hotmail.com

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5.3 As it is essential for the Company to have all critical information in order to be able to effectively evaluate and investigate a complaint, the disclosures made herein should provide as much detail and be as specific as possible. The disclosures should contain the following information:-

- (a) Details of the person(s) involved;
- (b) Details of the allegations such as nature, time and place;
- (c) Other relevant information; and
- (d) Any supporting evidence.

5.4 All disclosures received will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.

5.5 At the appropriate time, the whistleblower making the disclosures may need to come forward as a witness.

6. Handling of Complaints

6.1 The Chairman of the Audit Committee may direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. All information disclosed during the course of investigation will remain confidential, except as necessary or appropriate for the conduct of the investigation and to undertake any remedial action, in accordance with any applicable laws and regulations.

6.2 The Company reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees who fail to cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

6.3 If, at the conclusion of an investigation, the Company determines that a violation has occurred or the allegations are substantiated, remedial action commensurate with the severity of the offence will be taken.

7. Review of the Policy

7.1 The Company reserves the right to amend the Policy from time to time to maintain compliance with applicable laws and regulations or accommodate organisational changes within the Company.

History

Year	Date of Approval	Remark
2019	22 February 2019	Adoption of Whistleblowing Policy
2026	22 April 2026	Update the Whistleblowing Policy
2026	21 May 2026	Update the Whistleblowing Policy