



WHISTLEBLOWER POLICY AND PROCEDURE

CPE TECHNOLOGY BERHAD

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1. INTRODUCTION

CPE Technology Berhad and its subsidiary companies ("Company" or the "Group") are committed to foster an environment where high standards of integrity and ethical behaviour of its directors, key senior management and employees are maintained. The Group encourages its employees, contractors, suppliers, customers and other stakeholders to report of any suspected and/or known improper activities within the control of the Group. The improper activities may include any of the following:

- 1.1. Fraud, Theft, Embezzlement and Misappropriation
- 1.2. Corruption, Bribery and Blackmail
- 1.3. Misconduct and Wrongdoings
- 1.4. False Financial Statement Reporting
- 1.5. Breach Code of Conduct
- 1.6. Abuse of Power/Authority or Company's Properties or Resources
- 1.7. Breach of Contract or Law
- 1.8. Non-compliance with Regulatory Requirements
- 1.9. Miscarriage/Failure of Justice or Unfair Treatment
- 1.10. Conflict of Interest (as defined by the Group's Conflict of Interest policy)
- 1.11. Deliberate concealment of any of the above matters or other acts of wrongdoing.

2. OBJECTIVE

The objective of this policy and procedure is to establish a platform for reporting improper activities mentioned in para 1.0 above by any employee or any person who has the concern to prevent, detect and correct improper activities that may lead to negative impact to the Group in the short or long-term period.

3. SCOPE OF POLICY AND PROCEDURE

This policy and procedure is a guide for any employee or any person who has or had privileged confidential information to report any suspected and/or known improper activities involving the resources of the Group.

3.1. DEFINITIONS

- 3.1.1. "Company" or the "Group" construed to include CPE Technology Berhad and its subsidiary companies collectively.
- 3.1.2. "Confidential Information" refers to information that is confidential or sensitive in nature and/or not generally available to the public and includes information about the identity, position, residential address or other personal information of a Whistleblower and a person against whom a Whistleblower has reported.
- 3.1.3. "Fraud" refers to the act of making false representations of material facts whether by words or conduct, by concealing information, or by making misleading statements in order to obtain some benefit or payment that would otherwise not exist. Fraud includes (but is not limited to) any

questionable accounting practices or irregularities in the Group's reported financial statements and non-compliance with the Group's internal financial controls.

- 3.1.4. "Corruption" refers to an improbity or decay in the decision-making process in which a decision-maker consents to deviate or demands a deviation from the requirements set which shall rule his/her decision making in exchange for a reward or for the promise of the rewards.
- 3.1.5. "Bribery" refers to the offer or acceptance of anything valuable in exchange for influence on authority, government, public affairs and employees.
- 3.1.6. "Blackmail" refers to act of attempting to obtain money or any term of reward by intimidation, as by threats to disclose discreditable information.
- 3.1.7. "Misconduct" refers to unacceptable or improper behaviour especially by an employee or professional person.
- 3.1.8. "Wrongdoing" refers to illegal or dishonest behaviour.
- 3.1.9. "Resources" refers to a means to undertake a company to achieve the desired outcome. The most basic resources are material and, labour and capital.
- 3.1.10. "False Statement" refers to a statement that is known or believed by its maker to be incorrect or untrue and is made especially with intent to deceive or mislead.
- 3.1.11. "Breach" refers to the act of failing to perform or obey mutual agreement involving one or more parties and actively violating the term and conditions.
- 3.1.12. "Abuse" refers to act of practices that cause the unnecessary cost to the Group. Abuse can be use similar to fraud, except that it is not necessary to prove that abuse was performed knowingly, willfully and intentionally.
- 3.1.13. "Waste" refers to the act of spending money or using resources on goods or services in excess of actual need. Waste does not necessarily produce a benefit for the Whistleblower but is an act of poor management of resources.
- 3.1.14. "Reprisal" refers to an act of injury, violence or harm or damage against the Whistleblower for making a Whistleblowing report.
- 3.1.15. "Retaliation" refers to repay in kind or to get revenge.
- 3.1.16. "Whistleblower" refers to reporting by any individual/person of any suspected and/or known instances of improper activities as stated in para 1.0 above.
- 3.1.17. "ARMC" refers to the Group's Audit and Risk Management Committee appointed by the Board of Directors.

3.2. REPORTING RESPONSIBILITY

Any person has an obligation to report any suspected and/or known instances of improper activities as stated in para 1.0 above.

3.3. PROTECTION

The identity and personal information of the Whistleblower will be protected, secured and kept confidential unless agreed by Whistleblower or required by law.

Whistleblower will be protected from any form of reprisal including but not limited to the following:

- i. Action causing injury, loss or damage;
- ii. Mental and physical torture;
- iii. Intimidation/harassment;
- iv. Discrimination, discharge, abandon, suspension, demotion;
- v. Termination, victimisation of consequence in relation to her/his employment, career, profession, trade or business or the taking of disciplinary action due to his/her disclosure; or
- vi. Any threat to take any of the action referring to items i-iv above.

Where necessary, any person related or associated with the Whistleblower (e.g immediate family members) shall be accorded with similar protection under para 3.3 above.

3.3.1. ANONYMITY

It is the policy of the Group that Whistleblower should identify himself/herself when making a report.

However, if there are anonymous allegations reported on suspected and /or known instances of misconduct, wrongdoings, corruption, fraud, waste and/or abuse, the Group will consider investigating an anonymous allegation after having considered the following:

- i. the seriousness of the allegation;
- ii. the credibility of the allegation; and
- iii. the information and supporting evidence provided by the Whistleblower.

Where insufficient information is provided, the Group reserves the right not to investigate the alleged improper activities that is raised anonymously, due to the inability to seek clarification to ascertain relevant facts for investigation purposes.

3.3.2. 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.

In addition, the Group provides assurance that no disciplinary action can be taken against the Whistleblower 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.

3.3.3. CONFIDENTIALITY

The Group shall treat all reports or disclosures as sensitive information and take all reasonable efforts to maintain the confidentiality of the information. However, there may be circumstances, during the course of the investigation where it will be necessary to disclose the identity of the Whistleblower. If such circumstances exist, the independent party conducting the investigations shall endeavour to inform the Whistleblower that his/her identity is likely to be disclosed and to obtain his/her consent for the said disclosure.

4. REVOCATION OF POLICY, PROCEDURE AND PROTECTION

The protection mentions in para 3.3 above shall be revoked by the Group under the following circumstances:

- i. Withdrawal of reporting by Whistleblower due to insufficient evidence-based fact; or
- ii. The Whistleblower him/herself has participated, suspected and/or known of improper activities mentioned in para 1.0 above; or
- iii. The Whistleblower has wilfully or maliciously made his/her disclosure, knowing or believing the information is false, untrue or emotionally driven; or
- iv. The disclosure is made with the intention or motive to avoid dismissal or other disciplinary action.

In the event the whistleblower is implicated or discovered to be or has been involved in any improper activities, he/she may also be investigated so as to complete the fact-finding process.

5. REPORTING PROCEDURES

- 5.1. The Whistleblower shall make a confidential report of the improper activities mentioned in para 1.0 above, in writing. The report must provide full details of the improper activities which may not be limited to date, time, location, person(s) involved and, where possible with supporting evidence.
- 5.2. Any person who elect to remain anonymous is advised that the Group’s ability to investigate the alleged improper activities is limited to the extent of the contents of the report received by the Group.
- 5.3. The report must be made directly to the ARMC at the following:

**Committee Chairman,
Audit and Risk Management Committee (“ARMC”)**

Email : whistleblowing@cpetbhd.com

Address : No.6, Jalan Indah Gemilang 5, Taman Perindustrian
Gemilang, 81800 Ulu Tiram, Johor.

- 5.4. Whistleblowers also have the right to report to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act 2010 such as Malaysian Anti-Corruption Commission (“MACC”), Royal Malaysian Police (“RMP”) or etc.

6. PROCESS OF INVESTIGATION

- 6.1. ARMC Chairman in consultation with other members shall decide whether the allegation has merit and could be substantiated.
- 6.2. If an investigation is to be carried out, the ARMC Chairman may appoint the internal auditor of the Group or an independent party as the appointed investigator within 2 weeks from the date of allegation received, to carry out the necessary investigation works. The Whistleblower shall give his/her full cooperation during the course of the investigation if required.
- 6.3. All investigation process and report of outcome shall be completed within three (“3”) months from the date of appointment of the appointed investigator. If there is a need to extend an investigation period, a formal request highlighting unforeseen delays, newly discovered evidence, or complexities that emerged during the investigation must be made to the ARMC by the appointed investigator.
- 6.4. Upon completion of the investigation as mentioned in para 6.1 above, the ARMC shall review the investigation report and if there is an action to be taken, the ARMC shall refer the investigation report to the Board of Directors for appropriate action to be taken.
- 6.5. The Whistleblower will be informed of the outcome of the investigation.
- 6.6. All information, documents, records and reports relating to the investigation of the Whistleblower report shall be kept securely by the ARMC to ensure its confidentiality.

7. DISCLOSURE OF PERSONAL INFORMATION

The Group may disclose whistleblower’s personal information to the Board of Directors and the investigation team (“collectively, Recipients”), in order to follow up and, if appropriate, act on report’s complaint, or where required by law or regulatory authorities. Whistleblower’s personal information and whistleblowing report will not be disclosed to a recipient that is implicated in the improper activities reported. Please take note that the Group may not be able to conduct the investigation or the investigation may be affected if the whistleblower object to the disclosure of whistleblower’s personal information.

8. COMMUNICATION

The Group is committed to ensuring its Whistleblowing Policy is clear communicated and accessible to all employees and relevant external stakeholders. This commitment extends to providing awareness and training to all employees regarding the provisions of this Policy and the Group's whistleblowing channel.

The Group is committed to communicating with whistleblowers in a manner that is both appropriate and feasible. The Group will formally acknowledge receipt of whistleblower reports that raise genuine concerns about improper activities which include the whistleblower's full name and contact details. A general update on investigation outcomes may be provided, in accordance with the Group's Whistleblower Policy and Procedure.

Version History		
Version	Description of Change	Approval Date
00	Initial Issuance	29 December 2022
01	Revision	28 October 2024
02	Revision	21 August 2026