SOUTH MALAYSIA INDUSTRIES BERHAD

[COMPANY NO. 196901000152 (8482-D)]

AND

ITS GROUP OF COMPANIES

WHISTLEBLOWING POLICY

(WB Policy)

Whistleblowing Policy		
Effective Date: 23 May 2018	Version 1.0	
	Version 2.0	Revised: August 2026
Content/Process Owner: Audit Committee		
Top Level Committee: Board of Directors		
Independent Oversight: Group Internal Audit Department		

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1. POLICY STATEMENT

SMIB Group means South Malaysia Industries Berhad and its subsidiaries (collectively referred to as the "Group" or "SMIB"), which is committed to achieving and maintaining the highest standard of work ethics in the conduct of business in line with the Group's Code of Business Conduct & Ethics and good corporate governance practices. To uphold this aspiration, SMIB must detect and deal with improper conduct. One way of detecting this is through whistleblowers.

Whistleblowers who come forward in good faith with information on actual or potential improper conduct are protected under the Whistleblower Protection Act 2010. This Act requires the authorities receiving the complaint to protect whistleblowers' identities, grant them immunity from civil and criminal proceedings, and protect them from detrimental action.

Personal and/or work-related grievances are not considered subject matter under this Policy. Such matters shall be dealt with under the Group's Human Resources Policies and Procedures.

2. OBJECTIVES

The objectives of this Policy are to achieve inter alia, the following:

(a) provide and facilitate a consistent and systematic process for managing any actual or potential improper conduct;

(b) assist in ensuring that all allegations of the misconduct, wrongdoing, corruption, fraud, waste and/or abuse are identified and dealt with appropriately;

(c) encourage all employees, associates[1] and members of the public to raise genuine concerns and complaints on suspicious circumstances as early as possible knowing that their concerns will be taken seriously and investigated as appropriate and that their confidentiality will be respected; and

(d) Reassure all employees, associates and members of the public that they should be able to raise genuine concerns without fear of reprisals

[1] Business associates, partners, agents, vendors, suppliers, contractors, consultants and any other third-party service providers or persons who perform services for or on behalf of the Group

3. SCOPE OF IMPROPER CONDUCT

The following list sets out examples of improper acts, wrongdoings and misconducts that may be reported by SMIB personnel or associates, of which are not exhaustive:

(a) Any fraud, unlawful civil or criminal act;

(b) Any act of dishonesty, corruption, abuse of power or authority for personal financial gain, any unauthorised or ulterior purpose;

(c) Any breach of SMIB's Code of Conduct, Policies, and violation of laws, rules and regulations governing the business and operations of the Group;

(d) Any malpractices or misdeeds, such as unethical or unlawful activity concerning privileged information and material non-public information, market manipulation, rogue trading, forgery, misappropriation of funds and/or assets, and any other unprofessional conduct that violates laws, rules, regulations and Codes;

(e) Any unethical or questionable acts that pose or lead to health and safety risks, sexual or physical abuse, retaliation or retribution against the whistleblower and other similar acts; and

(f) Any creation of misleading, dissemination of misleading and/or false financial records.

4. PROTECTION

SMIB is committed to protecting the identity of whistleblowers. Whistleblower's identity will be kept confidential unless legally obligated to be disclosed by Law.

Where whistleblowers reasonably believe they are being subjected to any retaliation or detrimental action as a consequence of having made a whistleblowing report, they may inform or consult the Audit Committee in confidence.

5. REVOCATION OF PROTECTION

The Group reserves the right to revoke the whistleblower protection accorded under this Policy if the whistleblower has, or is found to have:

(a) made a report on Improper Conduct not in good faith
(b) participated in the reported Improper Conduct
(c) made a disclosure not in accordance with the requirements of this Policy, including any disclosure that is deliberately false, dishonest, mischievous, malicious, frivolous or vexatious
(d) made solely or substantially to avoid dismissal or any other disciplinary action

6. RIGHTS OF THE PERSON IMPLICATED

Any employees or other persons who may be implicated in wrongdoings/alleged wrongdoers will be given the opportunity to be heard during the investigation in representing the principle of “right to have a fair hearing”, as interpreted in the Law.

All alleged wrongdoers have the duty to attend and assist the investigation process.

7. PROCEDURES

An employee who reasonably believes or has reason to believe that inappropriate business conduct has occurred or is occurring should raise the issue with their immediate reporting manager or if the employee is not comfortable with the said manager, such conduct or activity should be reported to the Head of Department of the relevant business division. Upon receipt of such allegations, the same will have to report the occurrence to the Chairman of the Audit Committee.

The Audit Committee will then direct the internal audit to undertake the necessary inquiry and investigation, after which the Committee will make a finding based on the results of the investigation, and the same will be notified to the whistleblower.

If the claim of malpractice or misconduct is established, appropriate disciplinary actions will be taken against the defaulting officer up to and including termination of employment or contract.

Any concerns relating to improper acts, wrongdoings and misconduct should be in writing and directed to the Chairman of the Audit Committee by providing the following information which shall be classified as "Strictly Private and Confidential":-

- Nature of improper acts, wrongdoings and misconducts
- Name of person/persons involved;
- Date, time and location;
- The details of the events taken place;
- Other witness, if any
- Documentation or evidence available

At the contact details as stated below:-

Dato' Zainuddin Bin Yahya
Chairman of the Audit Committee
c/o South Malaysia Industries Berhad
13A Floor, Menara SMI
No. 6 Lorong P. Ramlee
50250 Kuala Lumpur

8. EFFECTIVE DATE

This revised Whistleblowing Policy is approved by the BOD and made effective as of 27 August 2026.