

WHISTLE BLOWING POLICY

1. Objective and Scope

- Support LB Aluminium Berhad's ("the Company") commitment to develop and maintain a high standard of corporate governance and business integrity;
- Serve as a platform for any parties to alert/disclose information which he reasonably believes shows malpractice or any wrongdoings;
- Provide a transparent and confidential process for dealing with concerns;
- Promote and maintain high transparency and accountability in the workplace;
- Ensure that employees can raise concerns without fear of reprisals and safeguard such person's confidentiality;
- Protect a whistleblower from reprisal as consequence of making a disclosure;
- Protect the long term reputation of the company;
- Support the company's values; and
- Maintain a healthy working culture and an efficient company.

The policy and procedures are applicable to the Company and its wholly own subsidiaries ("the Group"). All employees (whether permanent, contract, part-time or casual), Directors, Shareholders, Consultants, Vendors, Contractors, External Agencies or any other parties with a business relationship with the Group are encouraged to disclose any wrongdoings that may adversely affect the Group.

The following is a non-exhaustive list of examples of wrongdoing or improper conduct under the scope of this Policy:

- i. Fraud;
- ii. Corruption, bribery or blackmail;
- iii. Criminal offences;
- iv. Failure to comply with a legal or regulatory obligation;
- v. Miscarriage of Justice;
- vi. Endangerment of an individual's health and safety or unsafe work practices;
- vii. Misuse of company resources and assets;
- viii. Misappropriation of monies, forgery, cheating and criminal breach of trust;
- ix. Sexual harassment;
- x. Concealment of any or a combination of the above.

2. Principles

The principles underpinning the policy are as follows:

(A) Fairness and confidentiality. All concerns raised will be treated fairly, properly and confidentially.

(B) Reporting in Good Faith and No Retaliation. The Policy is meant to protect genuine whistle blowers from any unfair treatment as results of their report. The Group prohibits discrimination, retaliation or harassment of any kind against a whistle blower and will ensure that no disciplinary action will be taken against the complainant who submits a complaint or report in good faith.

However, the Group does not extend this assurance to someone who maliciously a raise a matter he/she knows is untrue. The Group will take disciplinary action against any employee who makes a false report, makes an allegation maliciously for personal gain and intentionally makes accusations and defamatory reports. The Policy strictly prohibits frivolous and bogus complaints.

3. Reporting Procedures

(A) Form of Reporting

- i. A disclosure of wrongdoing or improper conduct may be made verbally or in writing.
 - (a) For verbal disclosures, it is advisable to be recorded in writing by the Investigator and signed by the whistle blower to avoid any misunderstanding or misinformation.
 - (b) For written disclosure by way of a letter, delivered either by hand or by post, the letter must be properly sealed in an envelope labelled "Private And Confidential – Do Not Open If Not the Addressee".
 - (c) For written disclosure by any electronic media, it must be delivered directly to the persons as per Section 3(C) – "To Whom Should Disclosure be made".
- ii. The content of report shall contain the following information:
 - (a) Particulars of the complainant (name, address, phone number etc);
 - (b) Details of the allegation, reasons for complaints;
 - (c) Background information such as date, place and time of occurrence;
 - (d) Employees or parties involved or suspected or witnesses to the incidence and
 - (e) Other relevant information.

(B) Reporting Anonymity

Employees may choose to remain anonymous. However, maintaining anonymity may hinder investigation and deter liaison with the employee to seek further clarification or more information. Employees are encouraged to disclose their identity in making any report under this Policy, especially if further investigation is required.

Employees' identities will not be disclosed without prior consent, unless required by law. The Company undertakes to treat all allegations in a confidential and sensitive manner and to protect the identity of the whistle

blower.

(C) To Whom Should Disclosures be made:

- i. Any concern raised should be addressed to Internal Audit Manager

Ms Chang Chooi Nee
Internal Audit Manager, LB Aluminium Berhad
Email: changcn@lbalum.com.my

- ii. In the case where the employee feels the matter involves the Internal Audit Manager or the matter is serious and requires the attention of higher level of authority, the employee can report the matter directly to Executive Director.

Mr Yap Chee Woon
Executive Director, LB Aluminium Berhad
Email: yapcw@lbalum.com.my

4. Handling of Complaints and Action

- i. All matters reported will be reviewed within a reasonable timeframe, and after due consideration and inquiry, a decision will be made whether to proceed with a detailed investigation.
- ii. Only the Internal Audit Manager, Executive Director or specific person(s) specifically directed by the Audit Committee (“Investigator”) have the right to carry out investigation under this Policy.
- iii. The investigation process include the setting up of the Investigation Committee, collation of information via interviews with all relevant witnesses and every attempt to gather all pertinent data and materials from all available sources.
- iv. 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 dismissal.
- v. Upon completion of the investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation and decision.

5. Review of Policy

This Policy is subject to review where necessary and made available on the Company’s website.

6. Conclusion

Effective enforcement of this whistle blowing policy has the potential not only to reduce fraudulent activity significantly but also help to foster good relations and avoid crisis management. It is intended to encourage and allow employees to raise concerns within the Group rather than seeking resolution outside the Group.

Whistle blowing is a significant means of preventing and detecting fraud and should be part of an overall control framework. It assists the Group to address any shortcomings within its processes and to facilitate good governance practices.

This policy is reviewed and approved by the Board of Directors on 29 March 2022.