

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-owned 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 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 in accordance to 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' identity 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:

- (a) For verbal disclosure, 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" and delivered to the following postal address:-

Executive Director
Lot 11, Jalan Perusahaan 1,
Kawasan Perusahaan Beranang,
43700 Beranang, Semenyih,
Selangor.

- (c) For written disclosure by any electronic media, it can be emailed to whistleblowing@lbalum.com.my, of which the following personnel will receive the report:-

- 1. Mr Yap Chee Woon (Executive Director)
- 2. Tuan Haji Ahmed Azhar Bin Abdullah (Independent Non-Executive Director)
- 3. Mr Wong Say Young (Head of Finance)

4. Handling of Complaints and Action

- i. All matters reported will be reviewed within fourteen (14) working days from the report date, and after due consideration and inquiry, a decision will be made whether to proceed with a detailed investigation.
- ii. Only the Executive Director, Independent Non-Executive Director, Head of Finance 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 providing false information during an investigation, shall be subject to strict disciplinary action up to, and including dismissal.

- v. All information relating to the investigation is strictly private and confidential and shall not be disseminated to anyone without prior consent from the Investigator, unless required by any prevailing laws and regulations.
- vi. Upon completion of the investigation, appropriate course of action will be recommended to the Audit Committee for their deliberation and decision.
- vii. The Investigator will inform the whistle blower of the Audit Committee's decision within seven (7) working days after the case is concluded.
- viii. No action will be taken against the party accused of wrongdoing or improper conduct until he/she is proven guilty.

5. Review of Policy

This Policy will be reviewed by the Board of Directors annually or at a shorter interval whenever 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 26 June 2024.