

CHEMLITE INNOVATION BERHAD

Company No. 202401021849(1567698-V)
(Incorporated in Malaysia)

WHISTLE BLOWER POLICY

CHEMLITE INNOVATION BERHAD	Doc. No:	POL-003
TITLE: WHISTLE BLOWER	Eff. Date:	17 FEBRUARY 2025

Purpose

The whistle blower policy aims to encourage and enable employees to report concerns regarding unethical behavior, fraud, corruption, or violations of company policies without fear of retaliation.

Scope

This policy applies to all employees, director, vendor and contractors of Chemlite .

Complaint Type

Improper conduct among others include:

- Suspected or actual incidents of fraud or corruption, breaches in any law or regulations in Malaysia, Company's policies, procedures or legal obligation and misleading or deceptive conduct of any kind
- Auditing matters, including non-disclosure or any subversion of the internal or external audit process
- Breach of confidentiality obligations
- Abuse of authority
- Criminal breach of trust
- Criminal offence
- Embezzlement / misappropriation of company's funds
- Profiteering based on inside knowledge of the Group's activities
- Misuse of company information
- Forgery / alteration of any document or account within the Group
- Procurement fraud / suspicious dealings
- Negligence
- Impersonation of officials
- Money laundering
- Workers compensation fraud
- Asset misappropriation
- Any other detrimental wrongdoings

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Reporting Procedure

- a) **Confidential Reporting Channels:** Employees can report concerns through designated channels, such as a confidential email address, or post a letter company.
- b) **Anonymous Reporting:** Anonymous reporting options are available to protect the identity of whistle-blowers.

Protection Against Retaliation

- a) The identity of all complainants will be kept confidential and protected. Whistleblower are protected under the Laws of Malaysia Act 711:

The Whistle-blower Protection Act 2010

Making a complaint under the Whistleblowing Policy does not shield the complainant from consequences if it is found that the person is also involved in the same / other improper conducts or unlawful activity under the Policy.

- b) Chemlite prohibits retaliation against employees who make good faith reports under this policy.
- c) Retaliation includes but is not limited to termination, demotion, harassment, or any adverse employment action.

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How to report

All complaints and improper activity reports can be made through these channels:

- a) Send an e-mail to

whistleblowing@chemlite.com.my

- b) Post a letter to

**No.1297, Lorong Perindustrian Bukit Minyak 22,
Taman Perindustrian Bukit Minyak,
14100 Simpang Ampat, Pulau Pinang**

All these channels lead to the **Director, Managers and Internal Audit Committee**. For mailed in reports, they must be placed in a sealed envelope labelled “**Strictly Confidential. To be opened by Addressee only.**” on the top left-hand corner.

Investigation Process

- a) All reports will be promptly investigated by an impartial party or committee appointed by the company.
- b) Investigations will be conducted confidentially to the extent possible, and information will be disclosed only to those who need to know.

Review and Amendment

- a) This policy will be reviewed periodically and amended as necessary to reflect changes in laws, regulations, or company practices.