CHOO BEE METAL INDUSTRIES BERHAD

WHISTLEBLOWING POLICY AND PROCEDURES

1. Purpose

1.1 The Whistleblowing Policies and Procedures ("WPP" or "Policy") seeks to enhance corporate governance by helping to foster an environment where integrity and ethical behaviour is maintained and any illegality, wrong doings or malpractice ("Improper Conduct") in Choo Bee group of companies ("the Group") may be exposed.

1.2 This Policy is to provide a formal, confidential channel to enable employees and business partners of the Group to disclose any Improper Conduct in accordance with the procedures as provided for under this policy and to provide protection for the party who reports such allegations.

2. Scope

2.1 This Policy applies to employees including Management and Directors, and business partners of the Group with respect to their obligations to the Group's interest.

2.2 The following are examples of Improper Conduct, of which the list is non-exhaustive:

- Any fraud, unlawful civil or criminal act;
- Any act of dishonesty, corrupt, abuse of power or authority for personal financial gain, any unauthorised or ulterior purpose;
- Any breach of Code of Ethics, and violation of laws, rules and regulations governing the business and operations of the Group;
- Any malpractices or misdeeds, such as forgery, misappropriation of funds and/or assets, and any other unprofessional conduct that is in violation of laws, rules, regulations and the Group's Code of Conduct;
- Any unethical or questionable acts that pose or lead to health and safety risks, sexual or physical abuse, retaliation or retribution against the whistle blower and other similar acts; and
- Any creation of misleading, dissemination of misleading and/or false financial records.

2.3 A report of Improper Conduct may be made by:

(a) any employee who has knowledge of an Improper Conduct committed by another employee; or
(b) any external party that has knowledge of an Improper Conduct committed by an employee.

3. Objective

The Group 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 Conduct and good corporate governance practices. It aims to encourage any party to raise their concerns without fear of reprisal, allows for early detection of unlawful and unethical conducts and it helps nurture a culture of accountability.

4. Principles

The key principles of the Policy are:

- The Group has zero tolerance on any form of fraudulent misconducts, corrupted acts or major business and human rights violations, in line with the Group's Codes of Conduct and Value Statement.
- The Boards and Top Management must give full commitment in leading the Group and its employees towards a culture of integrity, openness, compliance and disclosure.
- The Group must provide assurance and protection to the whistleblowers who report discreetly in bona fide (good faith) on unethical behaviours and business misconducts within the organisation or of its business partners.
- The whistleblower must provide basic information on the alleged unethical behaviours and business misconducts, including his/her own personal information, to be qualified as the Group's registered or formal whistleblowing reports.
- All whistleblowers must escalate the alleged unethical behaviours and business misconducts through the approved formal channels and avenues as provided by the Group.
- The Group retains the prerogative in all instances to determine when circumstances warrant an investigation (after due deliberation and evaluation processes) and the appropriate investigative process to be employed in line with the relevant policies, laws and regulations.
- The Group must have clear investigation procedures and process to handle investigation of the whistleblowing cases.
- The Group must have proper record-keeping on all the reported cases of whistleblowing and maintain a high degree of confidentiality on such reports.
- The Group must be transparent on disclosure of reported whistleblowing cases and the outcome of cases being investigated, in line with good governance practice.

5. Reporting Procedures

5.1 Whistleblowers are encouraged to include the following information in their disclosure to the relevant designated recipients of the whistleblowing report:

a) Whistleblower's name and contact details such as telephone number and/or e-mail address;
b) Details of the allegation including where and when the alleged misconduct/wrongdoing took place;
c) Details of the person(s) involved;
d) Details of witnesses, if any;
e) Other relevant information; and
f) Any supporting evidence, if available.

5.2 For employee making the report, any concern should be raised with immediate superior. If for any reason, it is believed that this is not possible or appropriate for the said employee (or any external party), then the concern should be reported to Chief Executive Officer ("CEO") as follows:

Name:	Soon Cheng Hai
E-mail:	simonsoon@choobee.com.my
Telephone:	05-255-8111-Ext 110
Mail:	Choo Bee Metal Industries Berhad Wisma Soon Teik Aun Jalan Bendahara 31650 Ipoh Perak, Malaysia Attention: Mr Simon Soon, Chief Executive Officer *Mark* **Strictly Confidential**

a) The CEO shall set up an investigating team to conduct investigation on the issue/concern raised.
b) The progress of the investigation shall be reported to the CEO.
c) Upon completion of the investigation, the Investigators shall submit their full report together with recommendation to the CEO.
d) Actions mandated shall be carried out accordingly.
e) If the whistleblower is not satisfied with the way the matter is dealt with, he/she can escalate the report to the Audit and Risk Management Committee ("ARMC") Chairman.

Name:	Ng Leong Teck
E-mail:	leongteck_ng@yahoo.com
Telephone:	03-7873 9898
Mail	CS PARTNERS PLT (SS2 PJ) (Chartered Accountants) 61-6C, Jalan SS2/75 47300 Petaling Jaya Selangor, Malaysia Attention: Mr Ng Leong Teck, Partner *Mark* **Strictly Confidential**

g) The ARMC will deliberate the matter reported and decide on the appropriate action to be taken.

6. Confidentiality and Anonymity

All whistleblowing reports are treated with utmost confidentiality and or anonymously and without revealing the whistleblower's identity, to the extent permitted by law. The whistleblower is to be given an assurance that his/her identity will be only known to a few Top Management on a need-to-know basis and for investigation purpose. The outcome of the investigation will be fed back to the whistleblower. This is to encourage and give confidence to the whistleblower that the complaint will be investigated.

7. Protection to the Whistleblower

7.1 This Policy provides assurance that the whistleblower shall be protected against reprisals or retaliation, and immunity from disciplinary action from the whistleblower's immediate supervisor or department/division head or any other person exercising power or authority over the whistleblower in his/her employment, provided that:

a) only genuine concerns are reported, and the report is made in good faith with a reasonable belief that the information and any allegation in it are substantially true, and the whistleblower does not provide false or misleading information knowingly, negligently or recklessly in the report;
b) the disclosure is not made with malicious intent or ill will;
c) the disclosure is not frivolous or vexatious; and
d) the report is not made for personal gain or agenda.

7.2 The Whistleblower Protection Act 2010 provides safe avenues for whistleblowers to come forward with information on any alleged improper conduct and to make disclosures to the relevant authorities in good faith by protecting their identities and protecting them from detrimental actions.

8. Monitoring and Review

8.1 The Board, through ARMC and CEO, shall oversee the implementation of this Policy and monitor its scope and applicability to ensure its continued relevance and effectiveness.

8.2 This Policy shall be reviewed by the ARMC at least once every three (3) years or as and when the need arises for any amendment or update, before being recommended to the Board for approval.

Revision No.: 5
Approved by the Board : 18 November 2026