

Coraza Integrated Technology	Policy & Procedures	Document Number 100 – 018	Rev 2
Approved By: Board of Directors	Policy Title: Whistleblower Policy	Review Date: February 27, 2025	

Change Register		
Rev No:	Date	Description
0	06/14/21	Original
1	11/29/23	Changed “Risk Management Committee” wording to “Risk Management & Sustainability Committee” and reviewed the Policy.
2	2/27/25	Added presumption of innocence under Policy Statement. Change Investigation Process title to Considerations for Investigation. Added Investigation Process. Added consequence of wrongdoing under Protection of Whistle blowers.

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1 Objectives

The aim of this Whistle Blower Policy to encourage employees to report any wrong that may adversely impact the Coraza Integrated Technology (the “Company”), the Company's customers, shareholders, employees, investors, or the public at large, without fear of reprisals.

2 Policy Statement

2.1 The Company encourages all employees of the Group to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the company, employees have to exercise honesty, integrity and comply with all applicable laws, rules and regulations.

2.2 In pursuit of a high standard of corporate governance, the Company encourages its officers, employees, vendors / contractors, consultants and other parties to come forward and provide information about concerns with regards to unethical, unlawful actions, circumvention of internal controls and questionable business and financial practices.

2.3 The company guarantees the protection of the whistle blower from any form of retaliation or other discriminatory acts for information provided in good faith, while also upholding the presumption of innocence for any individual accused of wrongdoing.

3 Scope

3.1 This Whistle Blower Policy and Procedures applies to all officers, employees and business associates of the Group.

3.2 The Risk Management & Sustainability Committee or its delegates shall receive, retain, investigate and act on concerns of employees and business associates regarding

- a) questionable accounting, internal controls and auditing matters, including those regarding the circumvention or attempt circumvention of internal controls that would constitute a violation of the Companies policies and procedures, and
- b) questionable matters that would constitute a violation Code of Conduct Policy and / or violation of Anti-Bribery and Anti-Corruption Policy.

4 Definition

4.1 Good Faith: Good faith is evident when the report is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided however, a report does not have to prove to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

4.2 Wrongdoing: Examples of wrongdoing include, but not limited to

- a) Financial fraud or impropriety;
- b) Corruption or dishonest act;

- c) Breach of legal obligations;
- d) Improper conduct or unethical behaviour; and
- e) Any other similar or related inappropriate conduct or activities that might lead to other damaging implications to the Group.

4.3 Issues concerning human resource or adverse employment actions, safety or other important but unrelated matters do not form part of this program and should be directed to the Chief Executive Officer's office.

5 Responsibilities

5.1 Employees are not required to prove the cases but rather to provide sufficient information for the management to take appropriate steps.

5.2 The Board and the management give their assurance that employees will not be at risk to any form of victimization, retribution or retaliation from their superiors or from any of his management. This assurance does not however extend to those who are found to have raised the matter under false or malicious intention.

6 Procedures

6.1 Reporting Concerns

6.1.1 In addition to any other avenue available to an employee, any employee may report to the Chairman of Risk Management & Sustainability Committee and Independent Directors openly, confidentially or anonymously any concerns.

6.1.2 The report can be communicated in writing via mail or email.

Attention : Chairman of Risk Management & Sustainability Committee and Independent Directors

(mark "Strictly Confidential to be opened by the addressee ONLY")

Coraza Integrated Technology Berhad

Lot 2777, Lorong Industri 5,

Kawasan Industri Bukit Panchor,

14300 Nibong Tebal,

Pulau Pinang

Email : whistleblower@corazaintech.com

6.1.3 Whistle blowers should ideally leave their contact and names to facilitate investigation. However, if the whistle blower decides to make an anonymous report, his wishes will be respected. A call-back time of approximately 10 days after the receipt of the report will be allocated for the anonymous whistle blower to assist in further investigation in an anonymous manner.

6.1.4 The amount of contact between the whistle blower and the investigating party will depend

on the nature of the issue and the clarity of information provided. Further information may be sought from the whistle blower.

6.2 Receiving Concerns

- a) Any significant concerns shall be promptly reported to the Chairman of Risk Management & Sustainability Committee (“RMSC”) and Independent Directors or whoever is designated to receive these concerns.
- b) Each concern forwarded or made directly to the Chairman of RMSC and Independent Directors, whether openly, confidentially or anonymously, shall be reviewed by the RMSC, who may wish in their discretion; consult with any member of the management or employee whom they believe would have appropriate expertise or information to assist them. The RMSC shall determine whether the RMSC or management should investigate the concern.
- c) If the RMSC determines that management should investigate the concern, the RMSC will notify management in writing of the conclusion. Management shall thereafter promptly investigate the concern and report the results of its investigation, in writing to the RMSC. Management shall be free in its discretion to engage outside auditors, counsels or other experts to assist in the investigation and in the analysis of results.
- d) If the RMSC determines that it should investigate the concern, it shall promptly determine what professional assistance, if any it needs in order to conduct the investigation. The RMSC shall be free in its discretion to engage outside auditors, counsel or other expert to assist in the investigation and in the analysis of results.

6.3 Investigation Process

RMSC will oversee investigations to ensure impartiality and thoroughness. The RMSC or management, if assigned, may involve external auditors, legal counsel, or experts as required to conduct a comprehensive investigation. Findings of the investigation will be communicated to the whistleblower, where possible, ensuring confidentiality.

6.4 Considerations for Investigation

In determining whether management or the RMSC should investigate a concern, the RMSC shall consider, among any other factors that are appropriate under circumstances, the following:

a) Who is the alleged wrongdoer?

If an executive officer, senior financial officer or other high management official is alleged to have engaged in wrongdoing, that factor alone may put in favour of the RMSC conducting the investigation.

b) How serious is the alleged wrongdoing?

The more serious the alleged wrongdoing, the more appropriate that the RMSC should

undertake the investigation. If the alleged wrongdoing would constitute a crime involving the integrity of the financial statements of the Company, the factor alone may put in favour of the RMSC conducting the investigation.

c) How credible is the allegation of wrongdoing?

The more credible the allegation, the more appropriate that the RMSC should undertake the investigation.

6.5 Protection of Whistle blowers

- a) The RMSC shall not retaliate nor tolerate retaliation by management or any other person or group, directly or indirectly, against anyone who in good faith makes a report or provides assistance to the RMSC, management or any other person or group, including any governmental, regulatory or law enforcement body, investigating a significant concern.
- b) The RMSC shall not reveal the identity of any person who makes a report in good faith and who asks that his or her identity as the person who made such report remain confidential and shall not make any effort, or tolerate any effort made by any person or group, to ascertain the identity of any person who makes a good faith report anonymously.
- c) Any report that proves not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. Individuals found guilty of wrongdoing or policy violations may face disciplinary actions, up to and including termination of employment. Reports proven to be malicious or knowingly false will similarly be treated as serious disciplinary offenses.

6.6 Access To Reports and Disclosure of Investigation Results

- a) All reports and records associated with the concerns are considered confidential information and access will be restricted to members of the RMSC, outside parties or employees engaged to conduct the investigations or whoever the RMSC authorised to grant access to such reports.
- b) Concerns and any resulting investigations, reports or resulting actions will generally not be disclosed to the public except as required by the legal requirements or regulations or by any corporate policy in place at the time.

6.7 Record Retention

The RMSC shall retain for a period of seven years all such records relating to any significant concerns and to the investigation of any such concerns.

6.8 Monitoring and Review

The Company will monitor the effectiveness and review the implementation of this policy regularly and make necessary amendments if required.

7 Related Document

7.1 Anti-Bribery and Anti-Corruption Policy

8 Attachment

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