

WHISTLEBLOWING POLICY

AVANGAAD BERHAD ("Avangaad") is committed to promote values of good governance and integrity in carrying out business operations, aligning with Avangaad's missions as a local shipping company that emphasises SAFETY, QUALITY, ENVIRONMENT, and SECURITY CULTURE. In line with the values mentioned above, Avangaad provides our stakeholders a mechanism to raise concerns in good faith or on the basis of a reasonable belief on any improper conduct within Avangaad.

OBJECTIVES:

- This Policy is to support Avangaad's values and to provide a mechanism for Avangaad stakeholders to disclose any improper conduct that are against those values in accordance with the relevant internal procedures and governance on Whistleblowing and Raising Concerns.
- This Policy is to provide reassurance and protection for the Whistleblower who report on such allegations without fear of reprisals.

SCOPE:

This Policy is designed to facilitate Avangaad's stakeholders to disclose any improper conduct relating to, but not limited to, either of the following:

- a) Abuse of Power
- b) Bribery & Corruption
- c) Criminal offence
- d) Endangerment of an individual's health and safety
- e) Fraud
- f) Gross mismanagement
- g) Theft or embezzlement
- h) Misuse and/or misappropriation of Company's funds or assets
- i) Non-compliance with Policy & Procedures

This Policy applies to all Director, Staff, Crews, Officer, and subsidiaries of Avangaad. Avangaad stakeholders shall act accordingly with the applicable parts of this policy when dealing with, acting on behalf or in the name of Avangaad.

REPORTING PROCEDURES

- All disclosures are to be reported to the line manager or via the secured and confidential email address: topmanagement@avangaad.com.
- If a concern involves Top Management or the Appointed Person, or if the matter is grave in nature, stakeholders should contact the Board-level Oversight Committee at: acchairman@avangaad.com.

PROTECTION TO WHISTLEBLOWER

- The identity and personal information of the whistleblower will be protected and kept confidential, to the extent reasonably practicable or otherwise required by law, including the Whistleblower Protection Act 2010 (Act 711).
- An employee who internally discloses through whistleblowing any improper conduct committed or about to be committed within Avangaad will also be protected, to the extent reasonably practicable or otherwise required by law, provided that the disclosure is made in good faith.
- The whistleblower will also be protected from reprisal, including any form of harassment and victimisation as a consequence of disclosure.
- The whistleblower remains protected even if the investigation later concluded that the whistleblower was mistaken as to the facts and the procedures involved.
- If a whistleblower reasonably believes that he is being subjected to reprisal, including harassment and victimisation, as a consequence of whistleblowing, he may consult or report to the Appointed Person in accordance with the procedures under this Policy.

ANONYMOUS WHISTLEBLOWER

The whistleblower who wishes to report any improper conduct is encourage to remain anonymous.



Nasrul Asni Bin Muhammad Dain
Chief Executive Officer (CEO)
Rev. 2.0 | 1st April 2026