MYDCD BERHAD

Registration No.: 202501030429 (1631841-A)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1. INTRODUCTION

MyDCD Berhad ("**Company**") and its subsidiaries ("**Group**") are committed to the highest standard of corporate governance and business integrity.

In recognising the abovementioned values, the Group provides an avenue for all employees of the Group and members of the public to raise their concerns or disclose any improper conduct within the Group and to take appropriate action to resolve them effectively.

2. OBJECTIVE

The intended objectives of this policy are:

i. To encourage and develop a culture of openness, accountability, and integrity;
ii. To provide avenues for the employees to raise genuine concerns or allegations through the appropriate channels upon discovery of any possible misconduct;
iii. To ensure protection for an individual who reports the concerns or allegations in good faith in accordance with the procedures; and
iv. To enable the Management to be informed at an early stage about acts of misconduct.

3. SCOPE OF THE POLICY

This Policy applies to the Group.

All Directors and employees of the Group working at all levels and grades, shareholders and any third parties associated with the Group, which may include but are not limited to customers, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives, and officials are encouraged to report or disclose through established channels, concerns about any violations of the Code of Ethics and Conduct of the Group, including, but not limited to the following:-

a. Fraud or Dishonesty;
b. Breaches of Policies, Procedures and applicable laws and regulations;
c. Bribery or Corruption or blackmail;
d. Abuse of Power;
e. Conflict of Interest;
f. Insider Trading;
g. Criminal breach of trust;
h. Sexual Harassment;
i. Criminal Offences;

j. Misuse of confidential information; and/or
k. Concealment of any, or a combination, of the above.

This Policy does not apply to grievances concerning an employee's terms of employment or other aspects of concern or complaints within the scope of the Staff/Employment Policy.

4. ACTING IN GOOD FAITH

The Group expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it are sustainably true and not acting for personal gain. Any anonymous whistleblower will not be entertained. However, the Group reserves its right to investigate any anonymous disclosure. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

5. CONFIDENTIALITY

The identity of the whistleblower will be kept confidential. All records relating to whistleblowing reports will be retained securely, and access will be limited to those directly involved in the handling of the report. Consent of the whistleblower will be sought should there be a need to disclose identity for investigation purposes.

The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties any information regarding the improper conduct or any part thereof, including the status or outcome of an investigation into it, except:

i. to those who are authorised under this Policy;
ii. by lodging a report with an enforcement agency in accordance with the Whistleblower Protection Act 2010 or any other prevailing law;
iii. if required by law; and
iv. on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

Any person who obtains any confidential information in the course of any investigation of an allegation of improper conduct shall not disclose any part of the confidential information or any part thereof.

6. PROTECTION

Protection is afforded under this Policy in addition to any protections available under the Whistleblower Protection Act 2010 or other applicable laws. The Group assures the whistleblower who raises issues of concern that he/she will be protected from interference with his/her lawful employment or livelihood, including discrimination, discharge, demotion, suspension, disadvantage, termination, or adverse treatment in relation to his/her employment, career, profession, trade or business or the taking of disciplinary action as a result of his/her reporting, provided the report is made in good faith and without malice. Any party that retaliates, including harassment and victimization,

against a whistleblower who has reported allegations in good faith may be subject to appropriate action, up to and including legal action, where applicable.

7. REVOCATION OF POLICY

The protection stated above shall be revoked by the Group if:

v. The whistleblower himself/herself has participated in improper conduct, wrongdoings, corruption, fraud and/or abuse;
vi. The whistleblower made his/her disclosure without good faith;
vii. The disclosure was frivolous or vexatious; or
viii. The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistleblower himself/herself.

8. ACTION

a. The Chairperson/Chief Executive Officer ("**CEO**")/Executive Director(s) ("**ED**") of the Company who receives the complaint shall maintain all complaints received, tracking their receipt, investigation, and resolution.

b. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.

c. All reports will be investigated promptly by the person receiving the report or disclosure. If required, assistance from other resources within the Group can be sought.

d. Upon completion of the investigation, an appropriate course of action will be recommended to the Audit and Risk Management Committee of the Company ("**ARMC**") for their deliberation.

e. The decision taken by the ARMC will be implemented immediately. Where possible, steps will also be implemented to prevent similar situations from arising.

f. The ARMC shall then update the Board of Directors of the Company ("**Board**") on the report of the status and outcome of the investigation and whether the effectiveness of the implementation of this policy requires their attention and approval.

9. WHISTLEBLOWING REQUIREMENTS

The reports should be submitted together with the following information:-

a. Details of the whistleblower (strongly encouraged, even though whistleblower may choose to remain anonymous);
b. Type of activity/conduct;
c. The reason for the concerns;
d. Details of suspected personnel involved;

e. Details of the incident (including date, time and location of incident); and
f. Any supporting/documentary of all factual evidence.

10. REVERTING TO COMPLAINT

The whistleblower will be informed on the progress and status of the investigation, however, the Group reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owed to someone else.

11. WHISTLEBLOWING CHANNEL

The established channels for whistleblowing reporting are as follows:

a. Any concern should be raised with the immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Chairperson/CEO/ED. The channel of reporting is as follows:

By Mail: **Strictly Confidential**
MyDCD Berhad
3rd Floor, CJ11 Centre, Jalan Impact,
Cyber 6,
63000 Cyberjaya, Selangor

Attention: The Chairperson/CEO/ED

Or

By Email: whistleblowing@dcdtech.com.my

b. If for any reason, it is believed that reporting to Management is a concern or not possible or appropriate, then the concern should be reported to the Chairperson of ARMC. The channel of reporting to the ARMC Chairperson is as follows:

By Mail: **Strictly Confidential**
MyDCD Berhad
3rd Floor, CJ11 Centre, Jalan Impact,
Cyber 6,
63000 Cyberjaya, Selangor

Attention: The Audit and Risk Management Committee Chairperson

12. REVIEW OF THE POLICY

This Policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation, the Board's objectives, responsibilities and standards of corporate governance and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

13. BOARD APPROVAL

This Policy (Version No. 1) was reviewed and approved by the Board on 16 December 2025.