

VANZO HOLDINGS BERHAD
[Registration No.: 202301051922 (1545836-M)]

WHISTLEBLOWING POLICY

1. INTRODUCTION

Vanzo Holdings Berhad (“**the Company**”) and its subsidiary companies (“**Group**”) are committed to the highest standards of integrity, openness and accountability in the conduct of its business and operations as well as promoting and supporting a culture of honest and ethical behaviour, corporate compliance and good corporate governance.

This Whistleblowing Policy (“**Policy**”) draws up the general guidelines that allows the employees of the Group and other stakeholders to report or disclose without fear of retaliation any improper conduct or wrongdoing within the Group.

2. SCOPE

Conduct of any directors and employees of the Group will be considered to be improper when it does not meet the Group’s regulatory obligations or where it may otherwise be considered illegal, fraudulent, unethical, corrupt or inconsistent with the Group’s internal policies.

Examples of improper conduct include but are not limited to:

- Fraud (intentional or non-intentional);
- Misappropriation of assets;
- Criminal breach of trust;
- Illicit and corrupt practices;
- Questionable or improper accounting;
- Illegal or criminal offences;
- Conflicts of interests without disclosure;
- Misuse of the Group’s properties or confidential information;
- Endangerment of employees’ and public’s health and safety;
- Acts or omissions which are deemed to be against the interest of the Group, laws, regulations or public policies; and
- Deliberate concealment of any of the above matters or wrongdoing.

3. REPORTING 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. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

4. PROTECTION OF WHISTLEBLOWER

A whistleblower under this Policy may be accorded with the necessary protection of confidentiality, to the extent reasonably practicable.

A whistleblower employee will also be protected against an adverse employment action (such as penalty, demotion, suspension or dismissal) and retaliation should he/she comes forward with the following:

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- disclosing any improper conduct or wrongdoing committed or about to be committed;
- reports what he/she believes constitutes a violation of any internal or external guidelines, rules and regulations of the Group;
- reports any fraud committed by staff, breach of the Group's Code of Conduct and Ethics, conflicts of interests or similar policy breach, if made in good faith;
- provides information or causing information to be provided in an investigation conducted in-house or externally by any regulatory agency or authority (such as the police, government agencies or ministries, Securities Commission, Bursa Malaysia Securities Berhad and/or the Malaysian Anti Corruption Commission); and
- participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with any such report.

Any party that retaliates against someone who has reported a misconduct or wrongdoing in good faith may be subject to appropriate action, up to and including legal action, where applicable. However, protection under this Policy will not mean protection from disciplinary action (including termination of employment) arising out of false, frivolous, or baseless allegations made by a whistleblower knowingly.

5. WHISTLEBLOWING REQUIREMENTS

Any reports should be in writing, submitted via post or email and together with the following information:

- a) Details of the whistle blower (strongly encouraged, even though whistle blower 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.

6. WHISTLEBLOWING CHANNEL

Whenever possible, issues should be raised and dealt with through the normal reporting lines and procedures in the Group. If for any reason, it is believed that reporting to Management is not possible or appropriate, then the concern may be raised through alternative channel as follows: -

- a) by mail in a properly sealed envelope and indicated "**Strictly Confidential – To Be Opened by Addressee Only**" and addressed to:-
Vanzo Holdings Berhad
Address : No. 12, Jalan Tiang U8/92,
Seksyen U8, Bukit Jelutong,
40150 Shah Alam,
Selangor.
Attention : Chairperson of the Audit and Risk Management Committee

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b) by email to phait_lee@yahoo.com

This Policy does not replace the grievance procedures and/or disciplinary policies already in place but to provide additional avenues for employees or other stakeholders to report or disclose without fear of retaliation, any improper conduct or wrongdoing committed or about to be committed.

7. REVIEW OF THIS POLICY

The Board shall review and assess the relevance and effectiveness of this Policy periodically to assess their effectiveness, and in any event, at least once every 3 year, the Board deem necessary and/or require to ensure its relevance and effectiveness in keeping with the Group's changing business environment, administrative or operational needs as well as changes to legislations.

8. REVISION OF THIS POLICY

The provisions of this Policy can be amended and supplemented from time to time by a resolution of the Board.

9. PUBLISHED AT THE WEBSITE

This Policy is made available on the Company's website.

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