



ZANTAT HOLDINGS BERHAD

(Registration No. 202101040483 (1440783X))

WHISTLEBLOWING POLICY

Version 1	Adopted on 19 February 2024
Version 2	Adopted on 21 February 2025

1.0 POLICY STATEMENT

Zantat Holdings Berhad (“ZHB” or the “Company”) and its subsidiaries and associate (collectively known as “Zantat Group” or the “Group”) are committed to the highest standard of integrity, openness and accountability in its business and operations. It aspires to conduct its affairs in an ethical, responsible and transparent manner. In this regard, the Group is committed to developing a culture of openness and honesty where a person who is aware of a potential malpractice or misconduct is encouraged to report such matters in good faith without the fear of reprisal.

2.0 OBJECTIVE OF THE POLICY

This policy is to provide an avenue for all our employees and members of the public to disclose any improper conduct following the procedures as provided for under this policy and to provide protection for employees and members of the public who report such allegations.

The intended objectives of this Policy is to:-

- (a) facilitate employees, members of the public and other stakeholders of the Group to disclose and raise a genuine concern of any possible improper conduct through the appropriate channels;
- (b) to ensure protection to an individual from reprisal and safeguard such person’s confidentiality as consequence of making a disclosure, in good faith and in accordance with the procedures; and
- (c) to encourage and develop a culture of openness, accountability and integrity.

3.0 SCOPE OF THE POLICY

This policy is designed to facilitate employees and members of the public and other stakeholders to disclose any improper conduct (misconduct of criminal offence) through internal channel. This policy is a reporting channel for employees and business partners who have concerns regarding ethical issues or violations of the Anti-Bribery & Corruption Policy and Code of Conduct & Ethics. Such misconduct or criminal offences include the following:

- (a) Criminal offence or unlawful act such as fraud, corruption/bribery, theft, embezzlement and blackmail;
- (b) Forgery or alteration of any document or account belonging to companies within the Group;
- (c) Forgery or alteration of a cheque, bank draft, or any other financial document;
- (d) Misappropriation of Company’s funds, securities, supplies, or other assets;
- (e) Impropriety in the handling or reporting of money or financial transactions;
- (f) Profiteering as a result of insider knowledge of the Group’s activities;
- (g) Conduct which is an offence or a breach of law;
- (h) Financial malpractice;
- (i) Abuse of power and position for personal gain;
- (j) Any act that poses danger to health and safety;
- (k) Any act that causes damage to environment;
- (l) Conflict of interest;
- (m) Misuse of Company’s property;
- (n) Cyber threats and/or data breaches;
- (o) Any action that could harm the reputation or financial standing of the Group; and
- (p) Concealment of any of the above.

4.0 APPLICABILITY OF THE POLICY

Subject to the requirement of the relevant local jurisdiction, this policy is applicable to all employees of the Group including temporary staff, suppliers, contractors, third-party vendors, customers and any other individuals or organizations who have dealings with the Group.

5.0 TO REPORT AN IMPROPER CONDUCT

Employees and stakeholders are expected to report genuine concerns in good faith and with reasonable grounds when reporting a complaint. If you are aware of an improper conduct, as explained above, being committed by an employee of the Group, you may make a disclosure by email to ltpo@zantat.com.my. A whistleblower would need to reveal his/her identity when making a report. Anonymous disclosures will not be entertained. If allegations are proven to be malicious, parties responsible may be subject to appropriate action.

6.0 PROTECTION TO WHISTLEBLOWER

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. In addition, an employee who whistleblows internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct committed or about to be committed, to the extent reasonably practicable, including legal advice and representation if needed provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Protection may be revoked and appropriate action may be taken against a whistleblower if:-

- (a) you have participated in the improper conduct disclosed;
- (b) you made a material statement which you knew or believed to be false or did not believe to be true;
- (c) the disclosure of the improper conduct is frivolous or vexatious;
- (d) the disclosure of the improper conduct is made maliciously; or
- (e) the disclosure of the improper conduct is made solely or substantially with the motive of avoiding dismissal or other disciplinary action.

Any party that retaliates against a whistleblower who has reported a misconduct or wrongdoing in good faith may be subject to appropriate action, up to and including legal action, where applicable.

7.0 ANONYMOUS WHISTLEBLOWER

Any report submitted under this policy shall include the following information:-

- (a) details of the whistleblower (strongly encouraged, even though the whistleblower may choose to remain anonymous);
- (b) type of activity/ conduct;
- (c) details of the suspected personnel involved;
- (d) details of the incident including, where applicable, the date, time and location of the incident; and
- (e) any reporting/ documentary evidence.

Any anonymous disclosure will not be entertained. Any employee or member of the public who wishes to report improper conduct is required to disclose his identity to the Company in order for the Company reserves its right to investigate into any anonymous disclosure.



8.0 NOTIFICATION

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure. Actions mandated shall be carried out accordingly. Zantat Group reserves the absolute right to amend this policy from time to time.

9.0 REVIEW OF THE POLICY

The Audit Committee or the Board of Directors of Zantat can amend, modify or revise this policy unilaterally at any time without notice. Amendment, modification or revision may be necessary, among other reasons to maintain the compliance of the relevant laws and regulations and to accommodate organisational change within the Zantat Group. Any amendment, modification or revision to this policy will be communicated to all Personnel of Zantat Group

This Whistleblowing Policy was approved by the Board of Directors on 21 February 2025.