

MOBILIA GROUP Whistleblowing Policy

PURPOSE

Our company, MOBILIA Holdings Berhad (“Mobilia”) is committed to create value and contribute to society’s progress and development through our business activities. As a responsible corporation, we will commit to conduct our business activities with integrity, a law-abiding spirit and the highest ethical standards.

This Whistleblowing Policy (“policy”) aims to establish a robust, transparent and accountable communication channel for Employees and Stakeholders of our company to voice their concerns in an effective, responsible and secured manner when they become aware of actual or potential wrongdoings that will cause us to fall short of our social and corporate responsibilities; and enable us to take swift, fair and effective corrective actions that will enable us to comply with our social and corporate responsibilities and maintain the support and trust of Employees and Stakeholders.

DEFINITIONS

In this Whistleblowing Policy, the following terms have the following definitions:

“Code of Conduct” means the MOBILIA Holdings Berhad Code of Conduct;

“Employees” means all board of directors, executive officers, members of management, regular employees and contracted employees having employment relationships with our company, as well as temporary staff and seconded employees working under the control and supervision of our company;

“Employee Grievances” applies to personal dissatisfaction or complaints by Employees that are related to their employment and working conditions;

“Stakeholders” means third party suppliers, contractors, agents, consultants, distributors, customers and such other business partner which has direct or indirect business dealings with our company;

“Whistleblowing Committee” means not less than three members who shall be appointed by the Board;

“Whistleblowing Investigation Team” means the officer appointed by the Whistleblowing Committee within 10 calendar days upon received of the whistleblowing report;

“Whistleblowing Policy” or “Policy” means this whistleblowing policy, including any subsequent revisions and supplemental guidelines;

SCOPE AND APPLICATION

This Policy provides a system that enables our company’s Employees and Stakeholders acting in good faith to raise concerns and disclose actual or potential wrongdoings or misconduct in our company. These wrongdoings or misconduct include but are not limited to (i) violation of laws and regulations, (ii) unethical behaviour or breach of Code of Conduct, (iii) giving, solicitation or acceptance of bribes, (iv) acts that adversely affect the interests or values of shareholders and Stakeholders, (v) unauthorized disclosure or sale of company information, (vi) falsification of reports or documents, (vii) fraud, theft, embezzlement or misuse of company assets, (viii) improper or undesirable personal behaviour or misdeeds which seriously impacts our company’s business or reputation, (ix) sexual or other forms of harassment in the workplace; and (x) attempts to cover any of the aforementioned.

Employees and Stakeholders who raise their concerns in good faith in accordance with this Policy are protected from reprisals within the limits of the law and assured that all reported cases will be objectively investigated on a best effort basis and appropriate remedial measures taken where warranted. This Policy

is not intended to restrict or otherwise govern legal rights and obligations which Employees and Stakeholder have, or may have, in relation to the subject matter of the whistleblowing report.

This Policy is not intended for Employees to lodge Employee Grievances or appeal on disciplinary procedures. Employees can report Employee Grievances or lodge appeals on disciplinary procedures through our company's human resources department.

Employees and Stakeholders should exercise due care to ensure that the information in their whistleblowing report is accurate and truthful. No action will be taken against Employees or Stakeholders who make an allegation in good faith which is not confirmed by subsequent investigation. But this protection may be revoked if Employees and Stakeholders misuse or abuse the Whistleblowing Policy by making false, frivolous, malicious or vexatious allegations.

HOW TO MAKE A WHISTLEBLOWING REPORT

Employees and Stakeholders should report their concern at the earliest opportunity so that corrective action can be taken as soon as possible.

The monitoring and execution of this Whistleblowing Policy will be placed under the supervision of the Whistleblowing Committee comprising the following:

- (i) Members of our company's Audit & Risk Management Committee ("ARMC"); and
- (ii) Managing Director of our company.

The ARMC Chairman shall be the chair for the meeting of the Whistleblowing Committee where a quorum of no less than two (2) members are present and, in his/her absence, another member of the ARMC Committee shall be the chair.

Where any member of the Whistleblowing Committee is the subject of the investigation, the member will be recluses from attending any meeting of the Committee.

Employees and Stakeholders have the option to make whistleblowing reports in strict confidence through any of the following channels:

Reporting Mode	Contact Details
Letter	MOBILIA HOLDINGS BERHAD Lot 2782, GRN92507, Jalan Kempas 1, Mukim Jalan Bakri, 84200 MUAR, JOHOR, MALAYSIA Attention: Whistleblowing Committee
Submission	<u>Whistleblower Report Form</u>
Electronic mail	whistleblowing@mobiliainternational.com

Employees and Stakeholders making a whistleblowing report should disclose their (i) full name, (ii) NRIC and/or Employee Number (if applicable), as well as (iii) contact details such as telephone number and

email address. This will enable our company to accord the person making the whistleblowing report necessary protection under this Policy and also obtain more details pertaining to the whistleblowing report.

Reports may be made on an anonymous basis. However, natural justice usually requires that the details and identity of the Employee or Stakeholder submitting the whistleblowing report be disclosed in any disciplinary investigation or action to be taken against the person(s) who is a subject of the complaint in the whistleblowing report. Anonymous whistleblowing reports will therefore be considered at the discretion of the Whistleblowing committee. In exercising this discretion, the Whistleblowing Committee will consider (i) the seriousness of the issues raised, (ii) credibility of the whistleblowing report, and (iii) likelihood of confirming the allegation from the relevant sources.

Whistleblowing reports should include the following disclosures: (i) background and history of the concern (giving relevant dates), (ii) reason for the concern, and (iii) identity of the person(s) committing the alleged wrongdoing. Insufficient details in the whistleblowing report may impede the investigation and resolution of the concerns raised.

WHISTLEBLOWING INVESTIGATION

Upon receipt of the whistleblowing report, the Whistleblowing Committee will as soon as practicable establish a Whistleblowing Investigation Team comprising appropriate and suitably qualified personnel to investigate the concerns disclosed in the whistleblowing report in a fair and objective manner and at its discretion, consider involving any other or additional officer of the Company and/or Committee and/or an outside agency for the purpose of investigation. The investigation by itself would not tantamount to an accusation and is to be treated as a neutral fact-finding process. If the Whistleblowing Investigation Team finds that the alleged wrongdoing or misconduct is true, our company will take appropriate actions including disciplinary action, termination of contract and establishing new controls to prevent recurrence of the wrongdoing or misconduct in our company.

A member of the Whistleblowing Investigation team or an officer appointed by the Whistleblowing Committee will within 10 calendar days, contact the person who submitted the whistleblowing report to (i) acknowledge that the report has been received, and (ii) indicate how the report will be dealt. The Whistleblowing Committee is not obliged to contact the persons who submitted the whistleblowing report anonymously, exclude contact details or do not report in good faith.

The Whistleblowing Committee will keep a record of all steps taken in response to each whistleblowing report received as well as how the concerns raised were resolved.

The Whistleblowing Committee will report their findings to the ARMC and Board of Directors.

The Whistleblowing Committee will inform the Whistle-blower the completion of investigation but, the details of the findings shall not be disclosed to the Whistle-blower.

CONFIDENTIALITY AND SAFEGUARDS

All whistleblowing reports will be treated as confidential to the extent reasonably practicable. The identity of the Employee or Stakeholder who submitted the whistleblowing report may be kept confidential so long as it does not impede or frustrate the investigation. The investigation process may also reveal the source of the information and the Employee or Stakeholder who raised the concern may be required to provide a statement as part of the evidence.

This Whistleblowing Policy offers protection within limits of the law and to the extent reasonably practicable to Employees and Stakeholders who submit whistleblowing reports internally in good faith,

even if the allegations prove to be unfounded or mistaken. These Employees and Stakeholders will be appropriately protected from internal disciplinary actions (if applicable), dismissal, harassment, victimization or informal pressures. No protection from internal disciplinary action will be offered if Employees do not adhere to the procedures for whistleblowing and disclosures in this Policy.

This Whistleblowing Policy may be updated or amended from time to time by MOBILIA Holdings Berhad.

Adopted by Board on: 28 May 2020

Updated and adopted by Board on: 13 April 2023