



Company	Apex Equity Holdings Berhad [199001016563 (208232-A)]
Title	Whistleblowing Policy

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Document Version Control and Update History

Version Control	Update History	
	Updated Date	Description(s)
1.0	25 Jun 2014	Initial Version (in the HR and Administration Policies).
2.0	25 Jan 2019	Amended Version.
2.1	29 Jul 2021	Renamed as Whistleblowing Policy, and compilation of minor amendments.
2.2	27 Jul 2022	Amended definition on Appointed Person, and revised Audit and Risk Management Committee (ARMC) to Audit Committee (AC) from the constitution of the Board Committee, and revised on contact person's email address.
2.3	4 Oct 2022	Changed Company Logo. (Note: no changes on the contents).
2.4	28 Jul 2023	Updated Company Logo.
2.5	26 Feb 2026	Added definitions for Associate(s), Improper Conduct and Stakeholder, revised the review period of this Policy to a minimum three-year review cycle, and compilation of minor amendments.

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Preamble

This Whistleblowing Policy document the company policy that is established from the requirement under the Listing Requirements of Bursa Malaysia Securities Berhad.

The purpose of this Policy is to have a channel of communication between the employees and the Board Committee, and to promote good business conduct in line with the Malaysian Code on Corporate Governance (MCCG). It is also a channel of communication for the employees to report any genuine concerns, where such legitimate concerns can be objectively addressed.

This Whistleblowing Policy is publicly available at the company official website.

Whistleblowing Policy

1 Definition

- “Appointed Person” : The independent individual who is not subject to undue influence or pressure by management that will be the recipient to all whistleblowing reports.
- “Board” : The Board of Directors of the Company
- “Company” : Apex Equity Holdings Berhad
- “Associate(s)” : Any Director of the Company and any employee of the Group, including permanent, contract, probationary, temporary, and part-time employees, and includes any other individual engaged to perform services for or on behalf of the Group who is subject to this Policy.
- “Group” : The Company and its subsidiaries from time to time
- “Improper Conduct” : Any act or omission that is illegal, unethical, fraudulent, corrupt, negligent, oppressive, or in breach of any law, regulation, internal policy, code of conduct or fiduciary duty.
- “Policy” : Whistleblowing Policies & Procedures, unless specifically stated otherwise.
- “Stakeholder” : Any external individual or entity, including but not limited to shareholders, investors, suppliers, vendors, contractors, consultants, agents, customers, and business partners, that has a direct or indirect commercial, contractual, or professional relationship with the Group.
- “Whistle Blower” : An Employee of the Group who makes a disclosure in good faith of Improper Conduct or alleged wrongdoings occurring in the Group.
- “Whistle Blowing” : The disclosure in good faith by an Employee of the Group, to the management of Directors, of actual, suspected or anticipated mismanagement, corruption, illegality, or some other wrongdoings within the Group.

2 Applicability of the Policy

This Policy applies to the Associates, and other Stakeholders of the Group. Section of procedures as outlined in this Policy shall be applied to the Associates.

3 Overview

- 3.1 The Group is committed to maintaining the highest standards of integrity, transparency, accountability and ethical conduct in all its business activities.
- 3.2 All Associates and Stakeholders of the Group are encouraged to raise genuine concerns about possible improprieties in matters of financial reporting, compliance, malpractices and unethical business conduct within the Group at the earliest opportunity and in an appropriate way.
- 3.3 This Policy aims to:
 - (a) Support the Company's values;
 - (b) Ensure Associates can raise concerns without fear of reprisals and safeguard such persons' confidentiality;
 - (c) Protect a whistle-blower from reprisal in consequence of making a disclosure; and
 - (d) Provide a transparent and confidential process for dealing with concerns.

4 Scope of Matters

- 4.1 This Policy applies to, but is not limited to, the reporting of the following matters (not exhaustive):
 - (a) Financial malpractice, impropriety, fraud, misappropriation of funds, assets, theft or embezzlement or gross mismanagement;
 - (b) Corruption, bribery, blackmail, abuse of power or authority, or conflicts of interest;
 - (c) Failure to comply with laws or regulations or group/company policies and procedures;
 - (d) Criminal offences, breach of trust and miscarriage of justice;

- (e) Breach of fiduciary duties;
- (f) Serious misconduct or unethical behaviour;
- (g) Endangerment to health, safety or the environment;
- (h) Falsification or destruction of business or financial records, or misrepresentation or suppression of financial information; or
- (i) Concealment of any, or a combination, of the above.

4.2 This Policy does not apply to grievances concerning individual's terms of employment or other aspects of concerns or complaints within the scope of the Human Resource & Administration Policy.

5 Principles

5.1 The principles underpinning this Policy is as follows:

- (a) All concerns raised will be treated fairly and properly.
- (b) The Group will not tolerate harassment or victimization of anyone raising a genuine concern
- (c) The Group will ensure no Whistle Blower will be at risk of suffering some form of reprisal as a result of raising a concern even if he is mistaken. The Group, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue or is acting for personal gain.
- (d) The submission of a false or frivolous report may have consequences for Whistle Blower and he may be liable for damages towards anyone who suffered from such false report.

6 Policies & Procedures

6.1 If any Employee and Stakeholder of the Group believes reasonably and in good faith that suspected incident of Improper Conduct or malpractice exists within the Group, the Employee and/or the Stakeholder of the Group should report this immediately to the Appointed Person in writing, by hand, email to whistle@apexequity.com.my or post, providing as much detail as possible and specifying:

- (a) The Whistle Blower's full name and contact details;
 - (b) The background, date and history of the concerns;
 - (c) The reasons for the concerns;
 - (d) Details of witnesses and all factual corroborating evidence as is available;
 - (e) Whether the Whistle Blower has any personal interest in the matter;
 - (f) Whether action has already been taken by anyone.
- 6.2 The Associates and/or Stakeholders of the Group are encouraged to put their names to allegation in order to facilitate appropriate follow-up questions and investigation. Any anonymous disclosure will be investigated, but consideration will be given to:
- (a) The seriousness of the issue raise;
 - (b) The credibility of the concern; and
 - (c) The likelihood of confirming the allegation from other sources.
- 6.3 The Appointed Person who receives the complaint shall maintain all complaints received, tracking their receipt, investigation and resolution. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation. The Appointed Person may be assisted by other authorised personnel(s) in conducting the assessment or investigation, provided that such persons are independent and have no conflict of interest in the matter. Under no circumstances shall the Whistle Blower and/or the person who is the subject of the complaint be involved in the investigation process.
- 6.4 The Whistle Blower would be reminded not to contact the subject of the disclosure and to discuss the matter with anyone unless directed by the AC.
- 6.5 The Appointed Person may decide not to investigate a complaint if in his opinion the complaint:
- (a) Is trivial; or
 - (b) Is frivolous or vexatious; or

- (c) If the matter in respect of which the Whistle Blower has been requested to provide further information or clarification, and the Whistle Blower fails to respond within three (3) months from the date of such request.
 - (d) If the matter is determined not to be within the scope of this Policy, such matter will be transferred to the Head of Human Resources for appropriate procedures and actions to be taken.
- 6.6 The investigation shall be focused on the following: -
- (a) Collation of relevant information pertaining to the allegation;
 - (b) Conduct relevant interviews, if required;
 - (c) Review of the information collected;
 - (d) Maintenance of fair treatment to the Whistle Blower and the subject of the complaint;
 - (e) Protection of the identity of the Whistle Blower; and
 - (f) Recommendation of the findings.
- 6.7 Each case is treated with the strictest confidence and it is expected that the relevant investigations and findings shall be finalized within a period of 60 days from the receipt of the disclosure by the Whistle Blower. However, for complicated matters, a longer time period may be required with the consent of the AC.
- 6.8 The Whistle Blower shall be informed on the outcome of the investigation.
- 6.9 All investigations shall be tabled to the AC. The Audit Committee (AC) shall update the Board of Directors on matters that require their attention and approval.
- 6.10 The Group Legal, Human Resources and Administration shall maintain all relevant documents as confidential and stored the documents securely for at least seven (7) years.
- 6.11 The identities of the Associates or the Stakeholders of the Group will not be disclosed without prior consent. In the event where concerns cannot be resolved without revealing the identity of the Employee or the Stakeholders of the Group who raised the concern (i.e., if the evidence is required in court), a dialogue will be carried out with the Employee concerned as to whether and how the matter can progress further.

- 6.12 Disciplinary measures including formal warnings, reprimands, demotions, suspensions, termination of services, or monetary penalties may be taken against a Whistle Blower if they are found to have:
- (a) Committed a wrongdoing;
 - (b) Taken serious risks which would likely cause a wrongdoing to be committed;
 - (c) Made a disclosure not in accordance with the requirements of this Policy (for instance, dishonest, mischievous or malicious complaints); or
 - (d) Participated or assisted in any process pursuant to this Policy otherwise than in good faith.

For the purposes of this paragraph, the Chief Executive Officer or, in his or her absence, the Group Deputy Chief Executive Officer (collectively the 'Decisive Party') shall be responsible for determining disciplinary measures. The Decisive Party may, at their discretion, delegate this authority to the Group Chief Operating Officer or the Head of Human Resources.

- 6.13 The identity and personal information of the Whistle Blower will be protected and kept confidential, unless the Whistle Blower agrees otherwise or unless otherwise required by law. The Whistle Blower will be protected from reprisal, including any form of harassment and victimization, as a consequence of his disclosure. If a Whistle Blower reasonably believes that he is being subjected to reprisal, including harassment and victimization, as a consequence of Whistle-blowing, he may consult or report to the Appointed Person. It is an offence for:
- (a) Associates and Stakeholders of the Group to victimize Associates and/or Stakeholders of the Group thinking of making a complaint; and
 - (b) Any person who obstructs authorised officer in the performance of his/her duties.

7 Review of this Policy

This Policy shall be reviewed by the Board at least once every three (3) years or earlier if required, to ensure they remain consistent with the Board's objectives and responsibilities, and relevant laws, regulations, guidelines and standards of corporate governance.