



[Co. No. 197301001881) (15379-V)]

Whistle-Blowing Policy

26 April 2023

TABLE OF CONTENTS

| Sections | Contents | Pages |
|----------|-------------------------------|-------|
| 1 | Policy Statement | 3 |
| 2 | Objective | 3 |
| 3 | Type of Improper Conduct | 3 |
| 4 | Protection for Whistle-Blower | 4 |
| 5 | Whistle-Blowing Channel | 5 |
| 6 | Review of The Policy | 5 |



1. POLICY STATEMENT

EcoFirst Consolidated Bhd (“ECB” or “Company”) is committed to upholding values and highest standard of work ethics for all directors, managers and employees in line with good corporate governance and business integrity practices.

ECB has adopted whistle-blowing policy to provide an avenue for the employees of the Group and members of the public to raise genuine concerns of any wrongdoing or improper conduct involving the Group and its directors or employees.

2. OBJECTIVE

The objective of this policy is to encourage reporting of any suspected fraud, corruption, conduct or inappropriate behaviour of the Company. The policy will provide an avenue for all employees of ECB and all agents, vendors, contractors, suppliers, consultants and customers of ECB and members of ECB to raise concerns about any improper conduct without fear of retaliation and to offer protection for the reporter who reports such allegations. This will strengthen the accountability and transparency in the business affairs of the Company.

3. TYPE OF IMPROPER CONDUCT

The following shall constitute “Reportable Misconduct” under whistle-blowing policy but not limited to the followings:

- a. Fraud; misappropriation of funds or assets
- b. Misconduct such as bribery, corruption or blackmail
- c. Violation of the Company’s code of conduct, procedures or policies
- d. Improper or unethical conduct or behaviour
- e. Conflict of interest
- f. Theft or embezzlement of fund or assets
- g. Abuse of power or position
- h. Breach of confidentiality
- i. Criminal breach of trust
- j. Failure to comply with any legal obligations or breach of internal control
- k. Danger to health and safety of any employee of ECB or any other individual
- l. Sexual harassment



4. PROTECTION FOR WHISTLE-BLOWER

ECB is committed to ensuring confidentiality in respect of all matters raised under this policy and those who lodge a report in good faith.

a. Confidentiality

The confidentiality of identity of the whistle-blower will be ensured and protected, unless otherwise required by law. ECB assures that all reports will be treated in the strictest of confidence and will be promptly investigated.

b. Assurance against retaliation and immunity from disciplinary action

This policy provides assurance that the whistle-blower, if an employee of ECB, shall be protected against retaliation and immunity from disciplinary action from the whistle-blower's immediate supervisor or department/division head or any other person exercising power or authority over the whistle-blower in his/her employment. However, whistle-blowers making a report in bad faith or based on unfounded allegations or containing malicious claims maybe subjected to disciplinary actions by the Company.

5. WHISTLE-BLOWING CHANNEL

The channel of reporting is to email Whistle-Blowing Form to the followings :

- a. Chairman of the Audit Committee at alexchin@ecofirst.com.my ; and
- b. Chairman of the Governance and Risk Management Committee at patrickteoh@gmail.com; and
- c. Group Chief Executive Officer at khtiong@ecofirst.com.my .

The Group shall not entertain any anonymous whistle-blowing. However, the Group reserves the right to investigate any anonymous report. The whistle-blower shall disclose his/her personal identity in the form attached.

6. REVIEW OF THE POLICY

The Board and the Governance and Risk Management Committee will monitor compliance with the Policy and review the Policy regularly to ensure that it continues to remain relevant and appropriate.



WHISTLE-BLOWING FORM

A. Personal Details of Whistle-Blower

| | |
|------------------------|--|
| Full Name | |
| Staff No./IC No. | |
| Correspondence Address | |
| Telephone No. | |
| Mobile No. | |
| Email Address | |
| Designation/Occupation | |

B. Information of ECB employee(s) involved in Improper Conduct

| | |
|---------------------|--|
| Employee Name No. 1 | |
| Designation | |
| | |
| Employee Name No. 2 | |
| Designation | |
| | |
| Employee Name No. 3 | |
| Designation | |
| | |

C. Details of Improper Conduct

| | |
|-------------------------------|--|
| Date of incident | |
| Time of incident | |
| Location of incident | |
| Details of improper conduct | |
| Details of witnesses (if any) | |