



Policy

This policy document describes in detail the principle of actions regarding:

Whistleblowing Policy

Group Human Resources

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1. Policy Statement

- 1.1 NanoMalaysia Berhad (“NMB”) and its group of companies (“NMB Group” or “the Group” collectively) is committed to create value and contribute to society’s progress and development through its business activities. As a responsible corporation, NMB Group will commit to conduct business activities with integrity, a law-abiding spirit and the highest ethical standards.
- 1.2 This Whistleblowing Policy (“the Policy”) aims to:
- a) establish a robust, transparent and accountable communication channel for directors, employees, stakeholders and business associates or third parties to NMB Group to voice their concerns in an effective, responsible and secured manner when they become aware of actual or potential wrongdoings that will cause the Group to fall short of its social and corporate responsibilities; and
 - b) enable swift, fair, and effective corrective actions to comply with NMB Group’s social and corporate responsibilities and maintain the support and trust of directors, employees, stakeholders, business associates, and the public.

2. NanoMalaysia Berhad’s Commitment

- 2.1 NanoMalaysia Berhad and its subsidiaries are committed to conducting business dealings with integrity. This means avoiding practices of crime, misconduct, bribery, and corruption of all forms in the company’s daily operations.
- 2.2 The Policy leverages the core principles set out in the Group’s Code of Conduct and Ethics (“COCE”)¹, Third Party Code of Conduct (“TPCOC”)² and the Anti-Bribery and Corruption Policy (“ABCP”)³.
- 2.3 The Group has adopted a zero-tolerance approach against all forms of bribery and corruption and takes a strong stance against such acts.
- 2.4 Employees who are aware of any irregularity, misbehaviour, or non-compliance to the COCE, TPCOC and ABCP, and lodge an official report via NMB’s whistleblowing mechanism as outlined in this Policy will not be penalised.

¹ See NMB-HR-POL-00001 – Code of Conduct and Ethics

² See NMB-MR-POL-00002 – Third Party Code of Conduct

³ See NMB-BD-POL-00002 – Anti-Bribery and Corruption Policy

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3. Definitions

The following definitions are included in this Policy.

The Code	NMB Group's "Code of Conduct and Ethics" ⁴
Directors	Directors include all independent and non-independent directors, executive and non-executive directors of the Group and shall also include alternate or substitute directors.
Employee	A person employed by NMB Group, whether confirmed in a position or on probation, or any other person employed on contract, temporary basis, or secondment, or retain or appointed by NMB Group for a fixed or indefinite term to perform any function for NMB Group (inclusive of interns and apprentices).
Employee Grievances	Personal dissatisfaction or complaints by Employees that are related to their employment and working conditions.
NMB/the Company	NanoMalaysia Berhad.
NMB Group/the Group	NanoMalaysia Berhad and its subsidiaries.
Business Associate/Third Party	An external party with whom the NMB Group has, or plans to establish, some form of business relationship. This primarily includes Counterparties and Business Partners, i.e. clients, customers, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, subcontractors, suppliers, vendors, advisers, agents, distributors, representatives, intermediaries and investors, as defined by ISO 37001 - Anti-Bribery Management Systems.
Whistleblowing	Disclosure by a person to NMB Group, or to those in authority of mismanagement, corruption, illegality, violation of the Code or some other wrongdoings.
Whistleblowing Policy/the Policy	This whistleblowing policy, including any subsequent revisions and supplemental guidelines.

⁴ See NMB-HR-POL-00001 – Code of Conduct and Ethics

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4. Scope

- 4.1 This Policy provides a system that enables the Group's employees, stakeholders and business associates acting in good faith to raise concerns and disclose actual or potential wrongdoings or misconduct in the Group. These wrongdoings or misconduct include but are not limited to:
- a) violation of laws and regulations,
 - b) unethical behaviour or breach of NMB Group's Code of Conduct and Ethics,
 - c) giving, solicitation or acceptance of bribes,
 - d) acts that adversely affect the interests or values of shareholders and stakeholders,
 - e) unauthorized disclosure or sale of company information,
 - f) falsification of reports or documents,
 - g) fraud, theft, embezzlement or misuse of company assets,
 - h) improper or undesirable personal behaviour or misdeeds which seriously impact the Group's business or reputation,
 - i) sexual or other forms of harassment in the workplace; and
 - j) attempts to cover any of the aforementioned.
- 4.2 Employees, stakeholders and business associates 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, stakeholders and business associates have, or may have, in relation to the subject matter of the whistleblowing report.
- 4.3 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 Group Human Resources.
- 4.4 Employees, stakeholders and business associates should exercise due care to ensure that the information in their whistleblowing report is accurate and truthful. No action will be taken against employees, stakeholders or business associates who make an allegation in good faith which is not confirmed by subsequent investigation. But this protection may be revoked if employees, stakeholders and business associates misuse

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or abuse the Whistleblowing Policy by making false, frivolous, malicious or vexatious allegations.

5. Disclosure and Confidentiality

- 5.1 The Policy serves as a tool in preventing misconduct at the 'get-go' stage.
- 5.2 The Group encourages employees, stakeholders and business associates to make any disclosures openly and honestly and that concerns or complaints raised will be treated fairly and properly.
- 5.3 All disclosures made under this Policy will be dealt with in a confidential manner. Disclosures received under anonymity will not be entertained to prevent invalid malicious reporting, poison letters, exploitation and victimization.
- 5.4 The whistleblower is required to identify himself or herself and provide contact information in his or her report. This will facilitate the investigator to obtain further information, if required and communicate on results of investigation to the whistleblower.

6. Governance

- 6.1 The monitoring and execution of this Whistleblowing Policy will be placed under the supervision of the Board Audit and Risk Committee ("BARC")
- 6.2 Where any member of the BARC is the subject of the investigation, the member will be recused from performing the activities of screening, action, investigation and recommendation described in this Policy.

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7. Reporting

- 7.1 Employees, stakeholders and business associates should report their concern at the earliest opportunity so that corrective action can be taken as soon as possible.
- 7.2 Employees, stakeholders and business associates have the option to make whistleblowing reports in strict confidence through any of the following channels:

Reporting Mode	Contact Details
Letter	Board Audit and Risk Committee NanoMalaysia Berhad Unit A-2-3, Level 2, 157 Hampshire Place Office No. 1, Jalan Mayang Sari 50450 Kuala Lumpur Malaysia
Online Submission	Whistleblower Report Form in the NanoMalaysia Berhad portal ⁵
Electronic mail	whistleblower@nanomalaysia.com.my

8. Investigation

- 8.1 Upon receipt of the whistleblowing report, the BARC 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 Group and/or Committee and/or an outside agency for the purpose of investigation.
- 8.2 The investigation by itself would not be 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, the Group will take appropriate actions including disciplinary action, termination of contract and establishing new controls to prevent recurrence of the wrongdoing or misconduct in the Group.

⁵ See NMB-HR-FRM-00004 – Whistleblower Report Form

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- 8.3 A member of the BARC or an officer appointed by the BARC will as soon as practicable contact the whistleblower to:
- a) acknowledge that the report has been received, and
 - b) indicate how the report will be dealt.
- 8.4 The BARC is not obliged to contact the persons who submitted the whistleblowing report anonymously, exclude contact details or do not report in good faith.
- 8.5 The Whistleblowing Investigation Team will keep a record of all steps taken in response to each whistleblowing report received as well as how the concerns raised were resolved.
- 8.6 The BARC will report their findings to the Board of Directors.

9. Confidentiality and Safeguards

- 9.1 All whistleblowing reports will be treated as confidential to the extent reasonably practicable. The identity of the employee, stakeholder or business associate who submitted the whistleblowing report may be kept confidential so long as it does not impede or frustrate investigation. The investigation process may also reveal the source of the information and the employee, stakeholder or business associate who raised the concern may be required to provide a statement as part of the evidence.
- 9.2 This Whistleblowing Policy offers protection within limits of the law and to the extent reasonably practicable to employee, stakeholder or business associate who submit whistleblowing reports internally in good faith, even if the allegations prove to be unfounded or mistaken. These employees, stakeholders or business associates 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.