**AGMO HOLDINGS BERHAD**
**Registration No. 201701000550 (1214700-W)**
**(Incorporated in Malaysia)**

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# WHISTLEBLOWING POLICY

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## 1. INTRODUCTION

This Whistleblowing Policy (this "**Policy**") is adopted by **AGMO HOLDINGS BERHAD** ("**Agmo**" or "**the Company**") and its subsidiaries ("the "**Group**" or "**Agmo Group**"), and is designed to facilitate the disclosure of genuine and legitimate concerns relating to any known malpractice or wrongdoing involving the Group ("**Concern**" or "**Concerns**").

## 2. SCOPE

2.1. This Policy applies to all matters involving:

(a) the Group's Directors, employees (including permanent, temporary, full-time, part-time, probationary, contract employees, trainees and interns) and officers;

(b) any third external parties performing service for or on behalf of the Group. They include, but are not limited to, service providers, suppliers, business partners, joint venture entities and partners, associate companies, distributors, consultants, contractors and agents; and

(c) any other external stakeholders who do not fall within the scope of Paragraph 2.1(b) above, such as governments, government agencies, customers and the general public.

## 3. SAFEGUARDS

A person or entity making a protected disclosure or report is commonly referred to as a "**Whistleblower**", who provides initial information related to a reasonable belief that an improper activity may potentially occur, is occurring and/or has occurred.

A Whistleblower who reports a Concern in good faith is protected against retaliation, such as being dismissed or penalised by the Group. Retaliation, which is in violation of this Policy, is itself a reportable Concern under this Policy.

Such protection from retaliation, however, does not extend to any complicity in the matters that are the subject of the Concern or any other ensuing investigation. If the Whistleblower is involved in the Concern reported, the Group will nevertheless consider the circumstances, on a case-by-case basis, and the fact that the Whistleblower has reported the Concern.

## 4. CONFIDENTIALITY

4.1. Every effort will be made to protect the Whistleblower's identity and maintain confidentiality. The Group assures that it will not disclose the identity of the Whistleblower to any third party who is not involved in the investigation or handling of the matter, except where disclosure is required by law or by an order of a court of competent jurisdiction. In such circumstances, the Group may also be required to disclose confidential information relating to the whistleblowing report.

## 5. REPORTING PROCESS

5.1. Concerns which can be and should be reported

(a) Impropriety

This Policy covers improprieties or irregularities, suspected fraud or criminal offences, bribery or corruption, bullying or harassment, endangerment of an individual's health and safety, cover-up of any illegal acts, breach of confidentiality and failure to comply with legal or regulatory requirements.

(b) Violation of the Group's Ethical Business Standards, Contracts, and Policies and Procedures

This Policy also covers any violation or suspected violation of the Group's ethical business standards and conduct, significant breach of contract, policies and procedures which cannot be resolved through the Group's normal escalation channels. Retaliation within the Group or by the Group's personnel, including harassment, as a result of raising concerns is also a reportable Concern.

5.2. Reporting Channels

(a) Concerns shall be reported to the Group's Senior Management, as follows:

**Head of People and Culture Department**

**Address:** Level 38, Zetrix Tower, Empire City Damansara, Jalan PJU 8, Damansara Perdana, 47820 Petaling Jaya, Selangor, Malaysia

**Email:** hppc@agmogroup.com

**Group Chief Executive Officer**

**Address:** Level 38, Zetrix Tower, Empire City Damansara, Jalan PJU 8, Damansara Perdana, 47820 Petaling Jaya, Selangor, Malaysia

**Email:** groupceo@agmogroup.com

(b) In the event that reporting to Senior Management is a concern (such as, but not limited to, situations where the Concern involves Senior Management or a Director, the Concern involves a person closely related to Senior Management or a Director, or the Concern had been previously raised with Senior Management but without proper or reasonably satisfactory addressing measures or resolution), the Concerns can be reported directly to the **Chairperson of Audit and Risk Management Committee**, as follows:

**Chairperson of Audit and Risk Management Committee ("ARMC")**

**Address:** Level 38, Zetrix Tower, Empire City Damansara, Jalan PJU 8, Damansara Perdana, 47820 Petaling Jaya, Selangor, Malaysia

**Email:** acc.chairman@agmostudio.com

5.3. Reports

(a) Reports can be made verbally or in writing, including via formal letters or emails.

(b) Formal letters may be forwarded in a sealed envelope to the abovementioned contact person(s) marked as "Confidential: To be opened by the [Head of People and Culture Department] / [Chief Executive Officer] / [Chairperson of Audit and Risk Management Committee] only".

(c) The Whistleblower shall include the basis or reasons for reporting the Concern and disclosing as many details as possible in relation to the Concern. However, Whistleblowers are not expected to obtain substantial evidence of proof when reporting the Concerns.

(d) This Policy does not prohibit anonymous reporting. However, it shall be noted that anonymous reporting generally restricts substantially the ability of the Group to engage with the Whistleblower to obtain further information to assist the investigation or fact-finding process.

5.4. Handling of a reported Concern

(a) Generally, the person to whom the Concern is reported, i.e., the Head of People and Culture Department, the Group Chief Executive Officer or the Chairperson of Audit and Risk Management Committee (i.e. "Authorised Person"), shall have the responsibility and authority to determine the appropriate course of action and the resolution of the outcome.

(b) Initial inquiries will be made to determine whether an investigation is required and, if yes, the appropriate steps / procedures which should be followed. Some Concerns may be resolved without the need for investigation.

(c) All Concerns reported to Senior Management pursuant to Paragraph 5.2(a)) shall be updated to the Chairperson of Audit and Risk Management Committee on a quarterly basis, together with updates on the handling of such Concerns, the progress and outcome of investigations, and any actions taken or proposed to be taken arising from such investigations.

A reported Concern which has been resolved and concluded shall also be reported to the Chairperson of Audit and Risk Management Committee before being deemed as closed.

(d) Except where the Chairperson of Audit and Risk Management Committee decides otherwise, the Internal Audit function should be the named investigator if an investigation of the Concern is required.

(e) Persons involved in the handling of the reported Concern shall be impartial and independent of all parties involved or related to the Concern.

5.5. Outcome relating to a Concern

(a) If an investigation leads the Authorised Person to believe that a crime has been or has potentially been committed, the Concern shall be reported to the police or other law enforcement agencies as appropriate.

(b) Action taken to resolve or address Concerns reported shall be consistent with the Group's values and beliefs, including the Group's Code of Ethics and Conduct.

## 6. REVIEW AND MONITORING

The Group shall diligently monitor these procedures to ensure that they meet the objectives of relevant legislations and remain effective for the Group, and, if necessary, implement changes subject to the approval of the Board of Directors.

This Policy shall be reviewed at least once every three (3) years to assess its adequacy and effectiveness.

This Policy was updated and acknowledged by the Board of Directors on 26 May 2026.