

ACO GROUP Corporate Governance	Document No.: ACO_CG_002
	Revision: 3.0
	Effective Date: 24/10/2024

WHISTLEBLOWING POLICY

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POLICY STATEMENT

ACO Group Berhad (“ACO” or “Company”) is committed to achieving sustainable performance and delivering value to our stakeholders without compromising our ethical standards, behavioral expectation, and trusted reputation.

As such, we operate in a manner reflecting ACO’s core values, adhering to the best practice in corporate governance, and in accordance with all applicable laws, regulations and other policies applicable to ACO and its subsidiaries (“the Group”).

Whistleblowing is a means by which employees and stakeholders (e.g. shareholders, suppliers, customers, etc.) can report through established channels, concerns about unethical behavior, malpractices, illegal acts or failure to comply with regulatory requirements (“Improper Conduct”) that is taking place/has taken place/may take place in the future.

This policy is intended to assist and encourage whistleblowers to report such concerns without fear of reprisal should they act in good faith. It also serves to ensure both the whistleblower and the concerns reported are treated/handled with care and fairness. The Company views any harassments or retaliations in any form or manner against genuine whistleblower seriously.

SCOPE OF POLICY

This Policy applies to ACO Group Berhad and its subsidiaries (“the Group”). This Policy also applies to members of the public, where relevant. Employees, directors, shareholders, customers, vendors, or any parties with a business relationship with the Group may report any Improper Conduct that may adversely impact the Group.

Such Improper Conducts include but are not limited to the following:

- (i) Criminal offences, unlawful acts, fraud, corruption, bribery, and blackmail;
- (ii) Failure to comply with legal or regulatory obligations;
- (iii) Misuse of the Group’s funds or assets;
- (iv) An act of conflict of interest with suppliers, vendors or customer;
- (v) Act of omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment; and
- (vi) Abuse of power by an officer of the Group;

Only genuine concerns should be reported under whistleblowing procedures. Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.

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REPORTING PROCEDURES

- (i) ACO employees are encouraged to raise their concern with their immediate superior first. However, if this is not possible or is a concern, then the employee may report this to either the Group Managing Director (“GMD”) or the Executive Director (“ED”):

Attention	Group Managing Director - Mr. Tan Yushan	Executive Director – Mr. Tan How Ching
To mark	Strictly Confidential	Strictly Confidential
Mailing Address	ACO Group Berhad PLO 264, No. 14, Jalan Firma 3, Kawasan Perindustrian Tebrau 4, 81100 Johor Bahru.	ACO Group Berhad PLO 264, No. 14, Jalan Firma 3, Kawasan Perindustrian Tebrau 4, 81100 Johor Bahru.
Email	sean.tan@acogroup.com.my	hc.tan@acogroup.com.my

- (ii) In the case where reporting to management is not possible or is a concern, then the report should be made to either the Independent Non-Executive Chairman or the Chairman of Audit Risk Management Committee (“ARMC”):

Attention	Independent Non-Executive Chairman – Mr. Yap Koon Roy	Chairman of Audit and Risk Management Committee - Dr. Teh Chee Ghee
Email	yapkroy@gmail.com	cgteh@ymail.com

- (iii) Employees, or whistleblowers, are encouraged to use the Whistleblowing Form under **Appendix I** when making report. Alternatively, a report can also be made in writing with information of the issue clearly detailed.
- (iv) Anonymous reports are not encouraged as any follow-up to ascertain the facts or to obtain further information for investigation purposes would be difficult. In this regard, the Group is not expected to address any anonymous allegations although it may consider investigating an anonymous allegation after having considered the following:-
- The seriousness of the allegation;
 - The credibility of the allegation; and
 - The likelihood of confirming the allegation from credible sources.

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INVESTIGATION

- (i) All reports will be investigated promptly.
- (ii) For reports made to the GMD/ED, the GMD/ED may appoint an investigating officer (“IO”) from within the Group to investigate the report. This IO must be an employee of a designation higher than the employee(s) implicated.
- (iii) For reports made to the Independent Non-Executive Chairman/ARMC Chairman, an IO from within the Group (with a designation higher than the employee(s) implicated) or someone from external party who is free from any relationship or conflict of interest which could impair the objectivity and independence of the investigation may be appointed.
- (iv) If necessary, the IO may seek external legal counsel or professional advice at the Company’s expense to efficiently conduct the investigation.
- (v) The IO shall have full and unlimited/unrestricted access to information and documents/resources relating to the investigation. All employees are expected to extend their full co-operation throughout the course of investigation.
- (vi) At the conclusion of the investigation, appropriate course of action will be recommended to the GMD/ED or Independent Non-Executive Chairman/ARMC Chairman for their deliberation. Decisions taken will be implemented immediately.
- (vii) Any request to challenge/object a decision made by the GMD/ED will be escalated to the Independent Non-Executive Chairman/ARMC Chairman for further deliberation. Likewise, any request to challenge/object a decision made by the ARMC Chairman will be escalated to the Board of Directors where a final decision will be concluded.
- (viii) The entire process of investigation is to be documented, minuted, and made available for future reference.
- (ix) Where possible, steps will also be implemented to prevent similar situations from arising in future.

CONFIDENTIALITY

- (i) All reports received will be treated strictly as confidential unless disclosure is required by law, court or relevant authority, or with the consent of the person making the report.

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- (ii) Confidentiality will be accorded by the Company to the whistleblower if:
- The report is done in good faith;
 - There is a reasonable belief that the information and any allegation in it are substantially true;
 - The whistleblower has not communicated/disseminated details of the allegation through other channels or to any unrelated parties, both before, and during the investigation process;
 - The report made is not for personal gain or interest.
- (iii) Malicious and false allegations will be viewed seriously and treated as a gross misconduct and if proven may lead to dismissal.
- (iv) ACO reserves the right on the disclosure of details upon the final outcome and decision of the investigation.

This Policy (Revision 3.0) was reviewed and approve by the Board of Directors of the Company on 24 October 2024.

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APPENDIX 1

ACO GROUP BERHAD

[Company No.: 201901020410 (1329739-A)]
(Incorporated in Malaysia)

WHISTLEBLOWER REPORTING FORM

Important Notes:

1. Please read ACO's Whistleblowing Policy, available on the [Company's website](#) for more information. The Reporting Procedure details to whom you may submit this reporting form.
2. If you choose to submit this anonymously, please contact us within two (2) weeks of your report as we may need additional information concerning the alleged misconduct.

A. WHISTLEBLOWER/REPORTER'S CONTACT INFORMATION

Name	
Company, Department	
Position/Title	
Contact No.	
Email	

B. ALLEGED PERSON'S/SUSPECT'S INFORMATION

Name	
Company, Department	
Position/Title	
Contact No.	
Email	

C. WITNESS(ES)' INFORMATION (Please provide witnesses who can confirm your allegation)

Name (1)	
Company, Department	
Position/Title	
Contact No.	
Email	

Name (2)	
Company, Department	
Position/Title	
Contact No.	
Email	

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D. DISCLOSURE OF ALLEGED MISCONDUCT
 Briefly describe the misconduct and how you know about it. Specify what, who, when, where and how.
 If there is more than one allegation, number each allegation and use as many pages as necessary.

1	What was the misconduct which had occurred:
2	Date, time and location of the misconduct, or when and where you noticed the misconduct:
3	Are there any other parties involved other than the alleged person stated above:
4	Is there any evidence that you could provide. If yes, please specify:
5	Any other comment:

E. ACT IN GOOD FAITH
 Your report of the alleged misconduct by the alleged person signifies that you have read the Company’s Whistleblowing Policy and are making the report in good faith.

F. DECLARATION (including whistleblower who wishes to remain anonymous)
 I declare that this report is made by me without malicious intent, not carelessly, but after due and careful consideration.

Signature	
Date	