

## **Whistle-Blowing Policy**

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### **Purpose of the Policy**

This Whistle-blowing Policy (“the Policy”) is set up to provide an avenue for employees or non-employees (including suppliers, customers, shareholders, and other stakeholders) of Apollo Food Holdings Berhad and its subsidiaries (“the Group”) to report genuine concerns in relation to misconducts or criminal offences in the workplace.

Misconducts or criminal offences include:

- Fraud
- Bribery
- Theft
- Conflict of Interest
- Miscarriage of justice
- Breach of contract
- Breach of law
- Conducts that will cause danger to health and safety or to the environment
- Cover-up of the above conducts

### **Principles**

The principles underlying the Policy are:

- Internal procedures to enable the whistleblowing are in place and made clear to the Group’s stakeholders in a timely and responsible manner;
- All reports shall be treated equally and properly, and shall be dealt with in a timely manner;
- The Group will not tolerate whistleblower harassment or victimization which raises a genuine concern;
- The whistleblower’s identity and personal information will be protected and kept confidential, unless otherwise required by law;
- The whistleblower and the wronged party will be handled fairly. The whistleblower will be told of his/her disclosure’s status and suspected wrongdoer will be given the opportunity at an appropriate time to respond to all allegations; and
- The Group must ensure that no one is at risk of suffering any sort of reprisal because of a genuine concern. However, the Group does not extend this guarantee to someone who maliciously poses a problem which he knows is false.

### **Covered Concerns**

The report relating to the following concerns shall be reported:

- Corruption, bribery and fraud;
- Any criminal offense or breach of Malaysian laws;
- Acceptance of gifts/ favour beyond the Company’s approved threshold;
- Misuse and/or misappropriation of the company’s funds or assets;
- Breach of company’s code of conduct, including sexual, physical or other abuse of human rights; and

- Act or omission which endangers the health and safety of the employees of the company or the public.

## **Reporting Procedures**

### **(a) Who Can Disclose**

Any of the following persons can make a disclosure:

- The Group's employees, including temporary, contract staff or interns;
- Business Associates engaged by the Group or performing services for the Group, including suppliers, customers, contractors and other related parties; or
- Public's members, not being incorporated or unincorporated bodies.

### **(b) What To Disclose**

The following list is not exhaustive:

- Acceptance of favour/gifts;
- Corruption or fraud;
- Criminal offence;
- Misuse of the Group's funds or assets;
- Breach of Code of Ethics;
- Breach of Anti-Bribery and Corruption Policy;
- An act which creates specific danger to lives, health or safety of employees or the public; and
- Knowingly directing a person to commit any of the above wrongdoings.

### **(c) When To Disclose**

A whistleblower should provide any information or record that he or she considers fairly and discloses a crime that is likely to occur or be committed.

The whistleblower has to prove he/she has reasonable grounds for the allegations. Nevertheless, before making a declaration, this person is not required to obtain substantial evidence of proof first, beyond reasonable doubt. If, as a matter of fact, this individual recognizes that there are significant risks that a crime may take place, these legitimate concerns should be posed at that early stage.

Such information or record should be released within 14 days or within a reasonable timeframe. Delaying the disclosure could be counterproductive to both the whistleblower and any investigation, making it more difficult to address and resolve the concerns.

The designated Compliance Officer or the Audit Committee Chairman shall report the investigation conducted to the Board of Directors as required.

### **(d) How To Proceed**

The guidelines when making a disclosure are as follow:

- Under confidential cover a report may be made in writing or by electronic mail (“email”). The appointed officer shall write a verbal report, and the whistleblower shall confirm the written declarations;
- Unless required by law, whistleblower can make anonymous disclosure without disclosing his/her identity (i.e. name, designation, current address, contact number);
- A report should be accurate rather than speculative, and provide as much detailed information as possible so that the scope and level of urgency of the disclosure can be properly assessed. It shall contain at least the following details:
  - ✓ Details of the wrongdoing, for example, the date, time, place and alleged wrongdoer;
  - ✓ Particulars of witnesses; and
  - ✓ Particulars of documentary evidence.
- If the Audit Committee Chairman is the alleged wrongdoer, the whistleblower can report genuine wrongdoings to other member of the Audit Committee and any reference to Audit Committee Chairman shall refer to such member of the Audit Committee to which the wrongdoings are reported to. Any discovery or suspected of misconducts or inappropriate practices can be reported via:
  - [sefoo@llkg.com.my](mailto:sefoo@llkg.com.my) (Ms Foo); or
  - [halidhasbullah@yahoo.com](mailto:halidhasbullah@yahoo.com) (En Halid).

If the matter relates to one of the members of Audit Committee, he/she shall abstain completely from deliberating on such matter.

### **Investigation**

All alleged incidents reported will be investigated by the designated Compliance Officer or the Audit Committee Chairman to establish their credibility if any supporting documents are sufficiently provided. The designated Compliance Officer or the Audit Committee Chairman shall conduct the investigation in confidence via his/her discretion. The investigation can be carried out through reviewing documentation and electronic files, third party interviews and confirmation, etc. with all the records properly documented and retained for period of at least seven (7) years.

The designated Compliance Officer or the Audit Committee Chairman shall have the access of professionals necessary for the investigation at the cost of the Group.

### **Consequences of Wrongdoing or Wrongful Disclosure**

The appointed Compliance Officer or the Chairman of the Audit Committee shall revoke the whistleblower protection granted if he/she is of the opinion that the whistleblower has or is found to have, based on his/her investigation or during the course of his/her investigation:

- Committed a wrongdoing;
- Committed a breach under this Policy; or

- Participated in any process pursuant to this policy otherwise than in good faith.

The corrective actions to be taken against that whistleblower shall be determined by the Top Management on the advice of the appointed Compliance Officer or the Board of Directors on the advice of the Chairman of the Audit Committee which may include disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.

### **Whistleblower Protection**

The whistleblower will be protected under the Whistleblower Protection Act 2010 if he/she makes a disclosure in good faith to an enforcement agency. The identity of the whistleblower will not be disclosed in order to facilitate investigation. The Group will treat all the disclosures in confidential and ensure that there will be no reprisal or disciplinary actions taken on the whistleblower.

This policy is administered and overseen by Audit Committee.

### **Communication Channel**

Whistleblower is encouraged to provide evidences or any proof to support his/her reported matters for the ease of investigation. Any discovery or suspected of misconducts or inappropriate practices can be reported via [johnson@jkdaavidco.com](mailto:johnson@jkdaavidco.com) (Mr Johnson).

Any anonymous disclosure received will be subject to further investigation if there are sufficient supporting evidences of the malpractices provided and the recipient shall have the sole discretion to determine sufficient evidences of the malpractices are received to warrant further investigation into anonymous disclosure.

This policy is updated and adopted by the Board on 22 June 2023.