

WHISTLEBLOWING POLICY

Purpose of the Policy

This policy is set up to provide an avenue for employees or non-employees (including suppliers, customers, shareholders, and other stakeholders) 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

Whistleblower Protection

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 by the Group's Top Management 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:

- (i) Foo.SE@apollofood.com.my; or
- (ii) Aminah@apollofood.com.my.

Any anonymous disclosure will not be entertained. Nevertheless, the Group reserve its rights to investigate into any anonymous disclosure.

This policy is reviewed and approved by the Board on 28 March 2018.