

WELL CHIP GROUP BERHAD
Registration No. 202301014119 (1508041-A)
(Incorporated in Malaysia)

WHISTLE BLOWING POLICY

1. INTRODUCTION

Well Chip Group Berhad and its subsidiaries (“Group”) are committed to achieve and maintain the highest possible standards of corporate ethics.

The Group provides this mechanism for employees or stakeholders to report or disclose suspected improper conduct or any concerns related to matters covered by the Company’s Code of Ethics and Conduct confidentially and anonymously through established channels.

This policy and procedure ensure confidentiality and protect those making such allegations, in the reasonable belief that it is in the public interest to do so, from being victimised, discriminated against or disadvantaged.

2. SCOPE

This policy not only covers possible improprieties in matters of financial reporting, but also:

- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Misuse of Company’s Property;
- Sexual harassment;
- Abuse of power and position;
- Acts or omissions which are deemed to be against the interest of the Group, laws, regulations, requirements of statutory bodies or public policies;
- Violation and breach of the Group’s Code of Conduct and Ethics and Group Policies;
- Endangering the health and safety of an individual; and
- Concealment of any, or a combination of the above.

3. PRINCIPLE

All concerns raised will be treated fairly and properly. Any individual making a disclosure will retain their anonymity unless they agree otherwise.

The Board and management give their assurance that employees will not be at risk to any form of retribution or victimization from their superiors or from any of his / her management. However, employees must act in good faith with a reasonable belief that the information and any allegations are true. The reporting is not made for personal gain or interest and

not disclosed to any party that are not related. This assurance does not however extend to those who are found to have raised the matter under false or malicious intention.

The reporting individual is required to provide his / her identity and contact information in the reports in order for the Company to accord the necessary protection. Any person who elects to remain anonymous is advised that no whistleblower protection will be accorded and the Board's ability to investigate the alleged improper conduct is limited to the extent of the contents of the report received by them. However, the Company reserves its right to investigate any anonymous report.

4. PROCEDURE

<Without website>

Disclosure of any improper conduct should immediately report in writing (sealed mail or e-mail) to the Chairperson of the Company's Audit Committee ("the Committee") as follows:

Attention	:	Chairman of Audit Committee
By mail	:	(mark "Strictly Confidential to be opened by the addressee ONLY") Well Chip Group Berhad No. 23-01 & 23-02, Jalan Harmonium 35/3, Taman Desa Tebrau, 81100 Johor Bahru, Johor.
Via e-mail	:	whistleblowing@wellchip.com.my

In order to ensure the completeness of the required information, a reporting individual is encouraged to report using the attached whistleblowing form.

<With website>

Any employee/member of public who has reasonable belief that there is a serious misconduct, actual or suspected, in respect to any of the matters set out in Scope of the Policy above, should alert the Company through the following website:

<https://wellchip.com.my>

All the reports received by Chairperson of the Committee shall be immediately notified to any members of the Board of Directors or the Managing Director, subject to relativeness of report of information.

5. REQUIRED EVIDENCE

The Whistleblower is not required to prove the cases but rather to provide sufficient information regarding the type of activity or conduct, identity of the person(s) suspected as being involved, when it occurred and who was affected.

The Whistle-blower must have first-hand knowledge or information of the facts, i.e. information obtained from a third party or 'hearsay' will not be entertained. However, the

Whistleblower should not be discouraged from making a report because they are unsure whether there is sufficient evidence to support their allegations.

6. CONFIDENTIALITY

The whistleblower's identity will not be disclosed without prior consent (except where disclosure obligations are required under applicable laws and regulations).

Where such concerns are unable to be resolved without revealing the identity of the whistleblower and any other persons raising the concern, (e.g., if their evidence is required in court), we will enter into a dialogue with the whistleblower and/or any such other persons concerned as to whether and how we can proceed.

7. PROTECTION

A whistleblower will be accorded with protection of confidentiality of identity, to the extent reasonably practicable. An employee who whistle blows internally will also be protected against any adverse and detrimental actions as a direct consequence of the disclosure, to the extent reasonably practicable.

Protection will be accorded only when the whistleblower satisfies all the following conditions:

- The disclosure is made in good faith and with reasonable grounds supporting the information;
- The whistleblower is aware that the information and any allegations disclosed are true;
- The whistleblower has not communicated the disclosure to any other party not related to the disclosure; and
- The disclosure made is not for personal gain and interest.

Such protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and the rules and procedures involved.

Any attempt to retaliate, victimize or intimidate against anyone (whistleblower) making report in good faith is a serious violation of Whistleblower Protection Act 2010 and shall be dealt with serious disciplinary actions and procedures.

8. ACTION

The Chairman of the Group or the Chairperson of the Committee or any other individual which is designated by the Board of Directors, subject to relativeness of report of information, shall have the responsibility and authority to:

- Determine the legitimacy of the report;
- Direct further action; and
- Determine who should conduct the investigation.

If the report justifies for further investigation, the Chairperson of the Committee and any other personnel will be assigned to take the necessary actions to deal with the concerns raised, which include, but are not limited to the following:

- Concerns raised to be dealt with the Group’s policies such as disciplinary process; or
- To instruct a full-scale investigation on the concerns raised; or
- To appoint external party such as auditors or solicitors to conduct further investigation on the concerns raised; or
- To report of the concerns raised to enforcement agencies such as Polis Diraja Malaysia (“PDRM”), Malaysian Anti-Corruption Commission (“MACC”) and Suruhanjaya Syarikat Malaysia (“SSM”).

The Chairperson of the Committee shall prepare a summary report of all reports received and present it to the Committee on a quarterly basis, until closure of the case.

In event that the report is about any members of the Committee, the person will automatically abstain from attending any meetings in connection with the same.

The committee is required to keep detailed records of all evidence gathered, interviews conducted and all records received which affect the outcome of the investigation.

Upon the completion of the whistleblowing process and procedures, the whistleblower will be accorded the privilege to be notified on the outcome of the disclosure.

9. REVIEW

The Board of Directors or Audit Committee can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with laws and regulations and / or accommodate organisational changes within the Company or Group. However, the modification made shall be effective after the same is circulated to employees in writing or electronically.

This policy will be reviewed from time-to-time, at least once every three years to ensure that it continues to remain relevant, appropriate and effective in its execution.

**This Whistle Blowing Policy is adopted by the Board of Directors of Well Chip Group
on 19 June 2023**