

NWE RESOURCES GROUP BERHAD

[Registration No.: 202401037003 (1582850-V)]

(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1. INTRODUCTION

NWE Resources Group Berhad ("Company") and its subsidiaries ("Group") are committed to the highest standard of corporate governance and business integrity.

In recognising the abovementioned values, the Group provides an avenue for all employees of the Group and members of the public to raise their concerns or disclose any improper conduct within the Group and to take appropriate action to resolve them effectively.

2. OBJECTIVE

The intended objectives of this policy are:

- a. To encourage and develop a culture of openness, accountability, and integrity;
- b. To provide avenues for the employees to raise genuine concerns or allegations through the appropriate channels upon discovery of any improper conduct by any employee or Director of the Group (including any misconduct, wrongdoings, corruption, fraud and/or abuse of power) at the earliest opportunity without being subject to reprisals and/or retaliation (including victimisation, harassment or discriminatory treatment) and to have such concerns properly investigated and appropriate actions to be taken;
- c. To ensure protection for an individual or entity who reports and provided information related to a reasonable concerns or allegations in good faith in accordance with the procedures that an improper activity has occurred; and
- d. To enable the Management to be informed at an early stage about acts of misconduct.

3. SCOPE OF THE POLICY

This Policy applies to the Group.

All Directors and employees of the Group working at all levels and grades, shareholders and any third parties including but are not limited to any (legal or natural) persons including those providing services to, or having a business relationship with the Group such as customers, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisers, representatives, and officials are encouraged to report or disclose through established channels, to raise genuine concerns about any improper conduct or wrongful act or violations of the Code of Ethics and Conduct of the Group, including, but not limited to the following:-

- a. Fraud or Dishonesty;
- b. Breaches of Policies, Procedures and applicable laws and regulations;
- c. Bribery or Corruption or blackmail;
- d. Abuse of Power;
- e. Conflict of Interest;
- f. Insider Trading;
- g. Criminal breach of trust;
- h. Sexual Harassment;
- i. Criminal Offences;
- j. Misuse of confidential information; and/or
- k. Concealment of any, or a combination, of the above.

The above list is not exhaustive and includes any act or omission that, if proven will constitute an act of misconduct under the Group's Code of Conduct and Ethics or any criminal offense under relevant legislation in force. This Policy does not apply to grievances concerning an employee's terms of employment or other aspects of concerns or complaints within the scope of the Staff/Employment Policy.

4. ACTING IN GOOD FAITH

The Group expects all parties to act in good faith and have a reasonable belief that the information and any allegations in it are sustainably true and not acting for personal gain. Any anonymous whistleblower will not be entertained. However, the Group reserves its right to investigate any anonymous disclosure. If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

5. CONFIDENTIALITY

The identity of the whistleblower will be kept confidential. Consent of the whistleblower will be sought should there be a need to disclose identity for investigation purposes.

The Whistleblower or any person who is involved in the investigation process, shall not disseminate to third parties any information regarding the improper conduct or any part thereof, including the status or outcome of an investigation into it, except:

- a. to those who are authorised under this Policy;
- b. by lodging a report with an enforcement agency in accordance with the Whistleblower Protection Act 2010 or any other prevailing law;
- c. if required by court of law; and
- d. on a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice.

Any person who obtains any confidential information in the course of any investigation of an allegation of improper conduct shall not disclose any part of the confidential information or any part thereof.

6. PROTECTION

The Group assures the whistleblower who raises issues of concern that he/she will be protected from interference with his/her lawful employment or livelihood, including discrimination, discharge, demotion, suspension, disadvantage, termination, or adverse treatment in relation to his/her employment, career, profession, trade or business or the taking of disciplinary action as a result of his/her reporting, provided the report is made in good faith and without malice. Any party that retaliates, including harassment and victimization, against a whistleblower who has reported allegations in good faith may be subject to appropriate action, up to and including legal action, where applicable.

7. REVOCATION OF POLICY

The protection stated above shall be revoked by the Group if:

- a. The whistleblower himself/herself has participated in improper conduct, wrongdoings, corruption, fraud and/or abuse;
- b. The whistleblower himself/herself is involved in the activity that he/she reports;
- c. The whistleblower made his/her disclosure without good faith;
- d. The disclosure was frivolous or vexatious; or
- e. The disclosure was made with the intention or motive to avoid dismissal or other disciplinary action against the whistleblower himself/herself.

8. ACTION

- a. The Chairman/Group Managing Director (“GMD”)/Executive Director(s) (“ED”) of the Company who receives the complaint shall maintain all complaints received, tracking their receipt, investigation, and resolution.
- b. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.
- c. All reports will be investigated promptly by the person receiving the report or disclosure. If required, assistance from other resources within the Group can be sought.
- d. Upon completion of the investigation, an appropriate course of action will be recommended to the Audit and Risk Management Committee of the Company (“ARMC”) for their deliberation.
- e. The decision taken by the ARMC will be implemented immediately. Where possible, steps will also be implemented to prevent similar situations from arising.
- f. The ARMC shall then update the Board of Directors of the Company (“Board”) on the report of the status and outcome of the investigation and whether the effectiveness of the implementation of this policy requires their attention and approval.

9. WHISTLEBLOWING REQUIREMENTS

The reports should be submitted together with the following information:-

- a. Details of the whistleblower (strongly encouraged, even though whistleblower may choose to remain anonymous);
- b. Type of activity/conduct;
- c. The reason for the concerns;
- d. Details of suspected personnel involved;
- e. Details of the incident (including date, time and location of incident); and
- f. Any supporting/documentary of all factual evidence.

10. REVERTING TO COMPLAINANT

The whistleblower will be informed on the progress and status of the investigation. However, the Group reserves the right not to inform the whistleblower of the precise action plan and/or the outcome of the investigation as this may infringe a duty of confidentiality owed to someone else.

11. WHISTLEBLOWING CHANNEL

The established channels for whistleblowing reporting are as follows:

- a. Any concern should be raised to the immediate superior. If for any reason, it is believed that this is not possible or appropriate, then the concern should be reported to the Chairman/GMD/ED. The channel of reporting is as follows:

By Mail: **Strictly Confidential**
NWE Resources Group Berhad
No. 5, Jalan Peguam U1/25,
Seksyen U1, HICOM-Glenmarie Industrial Park,
40150 Shah Alam, Selangor

Attention: The Chairman/GMD/ED

Or

By Email: whistle@nwegroup.com.my

- b. If for any reason, it is believed that reporting to Management is a concern or not possible or appropriate, then the concern should be reported to the Chairman of ARMC. The channel of reporting to the ARMC Chairman is as follows:

By Mail: **Strictly Confidential**
NWE Resources Group Berhad
No. 5, Jalan Peguam U1/25,
Seksyen U1, HICOM-Glenmarie Industrial Park,
40150 Shah Alam, Selangor

Attention: The Audit and Risk Management Committee Chairman

Or

By Email: whistle@nwegroup.com.my

12. REVIEW OF THE POLICY

This Policy will be reviewed at least once every three (3) years to ensure its effectiveness and consistency with the governing legislation, the Board's objectives, responsibilities and standards of corporate governance and regulatory requirements, or more frequently should there be material changes to the said legislation and regulations or circumstance of the business, if any.

13. BOARD APPROVAL

This Policy (Version No. 1) was reviewed and approved by the Board on 16 March 2026. Any amendment(s) to this Policy shall be approved by the Board from time to time, when necessary.