

WHISTLE-BLOWING POLICY

Updated on 1 January 2025

1. SCOPE AND PURPOSE

At Vcorp Holdings Sdn Bhd (“**Company**”) and its subsidiaries and associated companies (“**Group**”), we take pride in our reputation and our commitment to conduct our business in a professional, ethical and moral manners operating within the framework of relevant laws, regulations and guidelines.

In line with this commitment, we have put in place a **Whistle-blowing Policy and Procedures** to provide an avenue for our directors, employees and third parties (such as investors, vendors, contractors, consultants, agents and business partners of the Group) to disclose any improper conduct that may be illegal, unethical, corrupt or otherwise cause damage to the Group’s reputation.

2. WHAT IS IMPROPER CONDUCT

Conduct by the Group, or any of its directors, employees and third parties will be considered to be improper when it does not meet the Group’s regulatory obligations or where it may otherwise be considered illegal, fraudulent, unethical, corrupt or inconsistent with the Group’s internal policies.

Examples of improper conduct include but are not limited to:

- Bribery and corrupt conduct;
- Fraud, theft, embezzlement or dishonest conduct;
- Breaches of policies and procedures (e.g. Code of Conduct);
- Breaches of applicable laws and regulations including any illegal activities;
- Insider trading and front-running;
- Conflict of interest;
- Substantial mismanagement of the Group’s resources or duties;
- Any form of harassment;
- Actions which can cause physical danger/harm to another person and/or can give rise to risk of damage to properties/ assets;
- Improper use or falsification of management and financial information;
- Conduct which may cause financial loss to the Group or bring it to severe public disrepute or ridicule or is otherwise detrimental to the Group’s interests; or
- Misuse of position or information.

Employee has a right to whistle blow any known or suspected incidences of improper conduct of the Group or any directors, employees and third parties. Reporting concerns can help the Group to improve processes and solve problems quickly. Such individual is referred to as “**Whistleblower**”.

3. HOW TO MAKE A REPORT

We take whistleblowing seriously and your concern matters to us. We would like to hear from you if any of your disclosure is related to improper conduct or practices occurring within or related to the Group.

Any disclosure can be made to any of the following dedicated reporting channels:

- (i) Write a proper report in word/pdf form; and then send it to Head of Compliance at email address: **compliance@vcorpcapital.com**
- (ii) For any reason, it is believed that this is not possible or appropriate to report to the channel as specified in (i) above, then the report should be made directly to our external auditor.

or

- (iii) Report directly to relevant government or regulatory authorities and enforcement agencies in Malaysia as prescribed by the Whistleblower Protection Act 2010 such as Bank Negara Malaysia (BNM), Securities Commission Malaysia (SC), Malaysian Anti-Corruption Commission (MACC), Police etc.

4. PROTECTION OF WHISTLEBLOWER

- (a) The Group encourages the Whistleblower to disclose his/her identity to enable him/her to be accorded with the necessary protection and to facilitate investigation. Nevertheless, the Whistleblower may choose to remain anonymous, although in certain circumstances, it may limit the conduct of a comprehensive investigation due to insufficient information.
- (b) The Group will accord protection of confidentiality to the Whistleblower to the extent reasonably consistent with the need to conduct an adequate investigation.
- (c) The Group will take all reasonable steps to protect the Whistleblower against any harassment, retaliation, victimization and recrimination, corresponding to its internal policies and scope under its purview and supervision.

5. INVESTIGATION

- (a) The Head of Compliance or another designated officer authorised by the Management Committee (“**MC**”) shall conduct preliminary investigation into the allegations received from the Whistleblower. If the allegation warrants further investigation, the Compliance Officer or the designated officer shall then conduct further investigation to establish the veracity of the allegations.

- (b) Allegations received and the outcome of each investigation shall be tabled to the MC periodically for their notation and further decision. When the veracity of an allegation is extremely serious, the Head of Compliance shall inform the Chairman of the MC as soon as practicable to enable the Chairman to schedule an emergency meeting to discuss and decide on the course action to be taken including, amongst others, suspension or disciplinary action and reporting the matter to the relevant authorities if required.

6. WITHDRAWAL OF REPORT

The Whistleblower who wishes to withdraw his/her report is required to write to our Head of Compliance, together with supporting reason(s) for the withdrawal. Notwithstanding such withdrawal, the Group reserves the right to proceed with the investigation on the matters arising from the report.