



## ASTINO GROUP OF COMPANIES

### WHISTLEBLOWING POLICY

#### a) Policy Statement

- The Group is committed to achieving and maintaining high standards of behaviour at work.
- All employees and stakeholders (i.e. shareholders / suppliers / customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns.
- Astino views any harassments or retaliations in any form or manner against genuine whistle blower seriously and will treat such action as gross misconduct, which if proven, may lead to dismissal.
- The policy and procedures is applicable to all companies within Astino Group.

#### b) Reporting and Investigation

- i. All employees and stakeholders (i.e. shareholders/ suppliers/ customers) are encouraged to report genuine concerns about unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements without fear of reprisal should they act in good faith when reporting such concerns;
- ii. Reports should be made to the Chairman of Audit and Risk Management Committee("ARMC"). Channel of reporting to the Chairman of ARMC is:

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Astino Berhad

Suite 12-A Level 12

Menara Northam

No. 55 Jalan Sultan Ahmad Shah 10050 Penang

Attention: Chairman of the Audit & Risk Management Committee

- iii. Astino accepts reports from anonymous sources. However, they will only be pursued if there is sufficient information to facilitate an investigation.
- iv. Astino commits to ensure that all disclosed information, including the identity of the Whistleblower shall be treated with strict confidentiality. Only the Chairman of ARMC shall have access to the report.
- v. If there is sufficient evidence that a corruption incident has occurred and contact details are provided, the discloser may be advised to report the incident directly to the MACC to secure official discloser protection.

#### c) Assurances and protection against retaliation

- i. The discloser shall receive no retaliation for a report that was provided in good faith, i.e. was not done primarily with malice to damage another person or the organisation. Such protection is accorded even if the investigation later revealed that the whistleblower is mistaken regarding the facts, rules and procedures involved.
- ii. Anyone who retaliates against a discloser will be subjected to disciplinary action, which may include termination of employment, demotion, or other legal redress.



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d) False or malicious reports

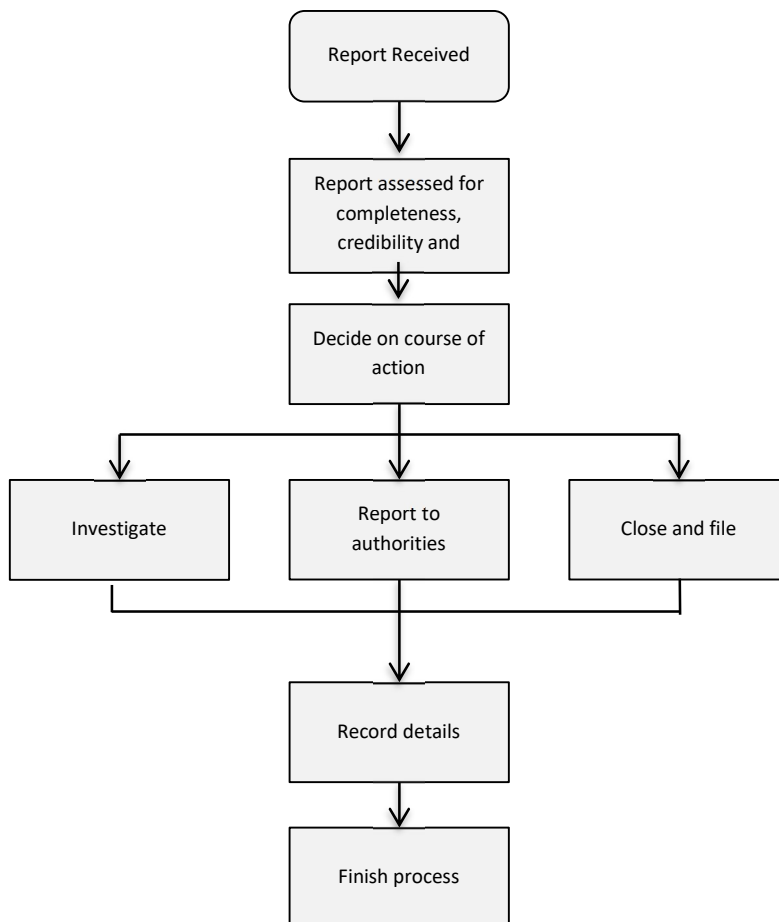
The Group will take disciplinary action against any discloser who makes a false report or knowingly slanders and/or commits a defamation on others. Disciplinary actions may include termination of employment, demotion, or other legal redress.

e) Incidents of corruption with evidence

Astino Berhad will decide whether or not to forward reports received to the MACC. Reports which include the items below should be submitted to the MACC:

- i. Material evidence of an incident of bribery and corruption
- ii. Specific details of the transaction(s)
- iii. Names of specific individuals
- iv. Other information considered substantial by investigators, in consultation with compliance manager(s)
- v. All reporting to the MACC must be done at the earliest opportunity once the materiality of the case is proven.

### *Whistleblowing Flowchart*



The policy was revised and approved on 22 March 2024.