MILIEU SYNERGY HOLDINGS SDN BHD
WHISTLE BLOWING POLICY

1.0 PURPOSE

In line with good corporate governance practices, the Management and Board of Directors of **Milieu Synergy Holdings Sdn Bhd** and its subsidiaries ("the Group") encourage all employees and stakeholders of the Group ("Reporting Individuals") to report suspected inappropriate behaviour or misconduct relating to fraud, corrupt practices and/or abuses involving the company's resources.

The Group recognised the importance of maintaining integrity, ethical and moral conduct of the business. We are committed to maintaining transparency, openness and accountability, where employees can report legitimate concerns in confidence and we welcome the voicing of genuine and serious concerns about actual or alleged malpractice and wrongdoing. This Whistleblowing Policy and Procedures are laid down to help achieve these goals.

This policy is made in reference to and consistent with Section 587 of the Companies Act 2016 ("the Act") and Malaysian Code on Corporate Governance ("MCCG") Practice 3.2.

This policy and procedures are designed to:

- Enhance value of integrity and honesty within the Group,
- Instil confidence in all employees about the commitment of the Group in respect of integrity,
- Give guidance on lodging of a complaint or report by any whistleblower,
- Ensure that any report or complain will be treated seriously and handled confidentially free,
- From any interference, and
- Give assurance that bona fide whistleblower will be protected from possible reprisals or victimization.

2.0 SCOPE & DEFINITIONS

SCOPE

All Directors and employees of the Group working at all levels and grades, shareholders and any third parties associated with the Group, which may include but are not limited to customers, suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives, and officials are encouraged to report or disclose through established channels, concerns about any violations.

DEFINITIONS

i) **Fraud** is generally defined as "any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain".

ii) **Occupational Fraud / Misappropriation of Assets** – i.e. use of one's occupation for personal enrichment through the deliberate misuse or misappropriation of the Group's resources and/or assets and/or the act of making false representations of material facts whether by words or conduct, by concealing information, or by making misleading statements in order to obtain some benefit or payment that would otherwise not have existed;

iii) **Fraudulent Financial Reporting** – i.e. intentional manipulation of financial statements, intentional misstatements and false disclosure of financial information;

iv) **Corrupt Practices** are operationally defined as the misuse of entrusted power for private gain;

v) **Abuse** – consists of any other practices that cause unnecessary losses or costs to a company. Abuse may be similar to fraud, except that it is not possible to prove that abuse was performed knowingly, wilfully and intentionally;

Whistle-Blower – A whistle-blower is a person or entity making a protected disclosure on wrongdoing(s) or inappropriate behaviour of misconducts. Whistle-blowers may be the Group's employees, vendors, contractors or the general public. The whistle-blower's role is as a reporting party. They are not investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.

3.0 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.

4.0 DISCLOSURE OF PERSONAL DATA

To raise a concern about an irregularity, fraud, corrupt practices, abuse or misconduct committed, a whistleblower shall refer the matter to the Chairperson of Audit and Risk Management Committee ("ARMC") through the following methods:

Whistleblowing Channels

Email :	whistleblow@milieusolar.com
Mail :	Attention to: TEH HENG WEE Address: B-06-27, EMHUB, PERSIARAN SURIAN, KOTA DAMANSARA, 47810 PETALING JAYA, SELANGOR

The whistleblower is required to show that the concern is genuine, without malicious intent, not motivated by personal gains, and is done in good faith.

The format of the report to be used by the whistleblower is provided in **Appendix A**.

5.0 SCREENING AND INVESTIGATION

The Chairperson of the ARMC who receives the complaint shall maintain all complaints received, tracking their receipt, investigation, and resolution. He/she may delegate the complaints to the appropriate candidate to screen its reliability and all reports will be investigated promptly.

Upon completion of the investigation, an appropriate course of action will be decided by the ARMC and implemented immediately. Where possible, steps will also be implemented to prevent similar situations from arising.

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.

6.0 ANONYMITY & CONFIDENTIALITY

i) The Group recognizes that the provision of anonymity to any individual/employee who willingly comes forward to report a suspicion of fraud is key in encouraging such reporting.

ii) However, to prevent false malicious reporting, poison letters and abuse of the reporting channel, all reporting individual(s) must identify with themselves and provide contact information in their reports which will be useful for the following purposes:

- To enable the independent investigation panel to verify each report and to obtain further information, if required;

- To facilitate any further investigations by auditors or the authorities where the identity of the informer is required by law; and
- To facilitate the communication of results of investigation to the whistle-blower.

iii) The Group will treat all reports and information provided as sensitive and will only reveal them on a "need-to-know" basis for the purposes of investigating the reports.

iv) The Chairman of the Audit & Risk Management Committee will have the ultimate discretion whether to reveal the identity of the whistle-blower. In the event that it is necessary to reveal the whistle-blower's identity, permission from the whistle-blower would be obtained before the information is released.

v) The same shall apply if the whistle-blower is not an employee of the Group.

7.0 WHISTLEBLOWER PROTECTION

The Reporting Individuals will be subjected to the provisions under the Whistleblower Protection Act 2010.

In addition, the Group provides assurance that **no disciplinary action can be taken** against the reporting individual(s) as long as he/she does not provide false information in the report **"purposely, knowingly or recklessly"** (i.e. if the report is made with malicious intentions).

Making a false report would result in consequences for the employee and he/she may be held liable for damages by anyone who has been affected by false report.

8.0 OTHER REPORTING CHANNEL

The whistleblower may also lodge a report with the police, Bank Negara Malaysia, the Malaysian Anti-Corruption Agency (MACC) or any other enforcement agency as defined under the whistleblower Protection Act 2010 and forward a copy of the said report to the Company to enable the company to conduct its own internal investigations.

9.0 REVIEW OF THE POLICY

This Policy will be reviewed by the Board 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 there should be material changes to the said legislation and regulations or circumstance of the business, if any.

10.0 BOARD APPROVAL

This Policy was reviewed and approved by the Board on 1st October 2025.

APPENDIX A

WHISTLEBLOWING FORM

WHISTLEBLOWING FORM

	REFERENCE NUMBER:	
A.	**DISCLOSURE DETAILS**	
1	**PARTY INVOLVED IN CONCERN RAISED**	
a.	Name of Alleged Wrongdoer	:
b.	Designation	:
c.	Division/Company	:
d.	How do you know this person?	
2	**DETAILS OF CONCERN** (You may use additional sheets if necessary)	
a.	Date / Time / Location	:
b.	Description of Concern	:
3	**SUPPORTING INFORMATION TO ASSIST INVESTIGATIONS** (Please attach supporting evidence to substantiate your disclosure and assist in investigation. You may use additional sheets for additional witnesses or supporting evidence if necessary)	
a.	Witness	Name: Department:
b.	Supporting Evidence	
B.	**REPORTING TO OTHER PARTIES**	
1.	Have you raised your concern to any other person / department / authority? (Tick whichever applicable) ☐ Yes ☐ No If yes, please state the person/department/authority the report was made/lodged and insert the date of the report. You may attach a copy of the report made.	
C.	**PARTICULARS OF WHISTLEBLOWER** **(YOU ARE ENCOURAGED TO PROVIDE YOUR CONTACT DETAILS TO ENABLE US TO CONTACT YOU FOR FURTHER CLARIFICATION IF REQUIRED)**	
a.	Name	:
b.	Designation / Occupation	:
c.	Contact No	:
d.	E-mail Address	:
e.	Relationship (if not Employee)	: