



WHISTLEBLOWING POLICY

1. Introduction

Coffex Coffee (M) Sdn Bhd (“Coffex Coffee”) is committed to maintaining the highest standards of integrity, transparency, and accountability in all aspects of our operations. In line with this commitment, we have established a formal Whistleblowing Policy to encourage individuals to raise genuine concerns about improper, unethical, or unlawful conduct within the organization without fear of retaliation.

This policy complies with the **Whistleblower Protection Act 2010**.

2. What is Whistleblowing?

2.1 Whistleblowing is the act of reporting or voluntary disclosure of individual by a person who has information about illegal, unethical, or improper conduct within an organisation or by organisation that is within its ability to control and believe that such illegal, unethical, or improper conduct should be exposed in the public interest.

2.2 **Improper Conduct** is generally described as any conduct by an employee which if proved constitutes a criminal offence or any conduct that constitutes a wrongdoing and may include any of the followings:

- (a) Breach of any law, regulation or rule that is applicable to the Company
- (b) Any criminal act including forgery, theft, corruption, bribery, misappropriation of company’s asset, unauthorised disclosure of the Company’s confidential information, abuse of power for personal gain. Criminal breach of trust, extortion and sabotage
- (c) Any act that causes significant financial loss or costs to the Company
- (d) Any other actions that will cause significant harms to the Company including abuse of power or conflict of interest, violation of company policy or procedures, health, safety, or environmental violations, harassment, discrimination, or unethical behavior
- (e) Any deliberate concealment of information concerning any of the matters listed above.

3. Objectives

The primary objectives of this policy are to:

- (a) Raise genuine concerns in a safe and confidential manner about any improper conduct or wrongful act that is committed involving full time or part-time employees, contract staff and interns, directors and senior leaders, external business partners including customers, suppliers, agents, dealers, distributors, consultants, and contractors and others performing works for and or on behalf of Coffex Coffee

- (b) Safeguards whistleblowers from negative consequences such as job loss, or harassment for reporting concerns in good faith through the Coffex Coffee whistleblowing channel
- (c) Promotes a culture where employees and other stakeholders are held accountable for their actions.
- (d) Act as an early warning system and enable the company to remedy any wrongdoings before serious damage is caused
- (e) Enhance corporate governance by helping to foster an environment where integrity and ethical behaviour is maintained
- (f) Prevent and detect unethical, illegal, improper conduct, fraud, or violation of company policies and legal obligations in Coffex Coffee's operations
- (g) Ensure impartial and effective investigation of all whistleblowing reports.
- (h) Reinforce compliance with Malaysian legislation and international corporate expectations

4. Quantitative Targets

Under this policy, Coffex Coffee undertakes to meet the following targets:

- (a) Acknowledgement of 100% of whistleblowing complaints within 5 working days;
- (b) 100% follow-up on all whistleblowing complaints within 14 days of receipt;
- (c) Updates to all known whistleblowers on the progress of the investigation until full resolution;
- (d) Completion of investigation within 60 days except for cases of extension (if required)

5. Scope

This policy applies to all individuals associated with Coffex Coffee, including:

- (a) Full-time and part-time employees
- (b) Contract staff
- (c) Interns
- (d) Directors and senior leadership
- (e) External business partners including suppliers, dealers, distributors, customers, consultants, agents, and contractors

6. Reporting Channels

Any concerns should be reported as soon as possible. The following reporting channels are available:

- (a) Email at ethics@coffexcoffee.com
- (b) Post to Coffex Coffee (M) Sdn Bhd at No. 5, Jalan Jururancang U1/21, Hicom Glenmarie Industrial Park, Seksyen U1, 40150 Shah Alam, Selangor (addressed to the Head of Human Resources Department).

- (c) In-person appointment by contacting the Head of Human Resources Department or members of the Whistleblowing Committee
- (d) Anonymous submission via suggestion box and/or Google Forms.

7. Anonymous Reports

- 7.1 Anonymous reports are accepted provided sufficient information is provided.
- 7.2 However, anonymous reports are not encouraged as any follow up to ascertain the facts or to obtain further information for investigation purposes would be difficult.
- 7.3 Coffex Coffee is not obliged to follow up on externally submitted anonymous reports.

8. False Allegations

Deliberately false or malicious allegations will be treated as a serious disciplinary offense.

9. Whistleblower Protection

9.1 Confidentiality:

- 9.1.1 All concerns will be treated in confidence and any person having knowledge of a report of improper conduct shall make all reasonable efforts to maintain the confidentiality of the confidential information, in particular, the whistleblower's identity, unless required by law. Anonymous reports will be accepted and investigated where sufficient information is provided.
- 9.1.2 However, in any case where it will be necessary to disclose the identity of the whistleblower, the Whistleblowing Committee involved in the investigations shall endeavour to inform the whistleblower that his/her identity is likely to be disclosed and to obtain his/her consent for such disclosure
- 9.1.3 No protection to the whistleblower if the report is not made in good faith; if the whistleblower involved in the improper conduct reported; report of improper conduct is made with the motive of avoiding dismissal or other disciplinary action; or the whistleblower breaches his/her obligations of confidentiality under this Policy
- 9.1.4 Any employee who has participated in an improper conduct may be subject to disciplinary action. However, in certain circumstances, the Whistleblowing Committee involved in the investigation can consider leniency for the employee. However, Coffex Coffee has no power to provide any immunity from criminal prosecution. Under section 25 MACC Act, Coffex Coffee has an obligation to refer matters of a criminal nature to the authorities.
- 9.1.5 All information and documentation relating to the investigation, its decision, and enforcement, shall be kept securely to ensure its confidentiality.

9.2 Protection Against Retaliatory Actions

- 9.2.1 Any employee who makes a report of improper conduct in good faith shall not be subject to unfair dismissal, victimisation, demotion, suspension, harassment, discrimination, or any other retaliatory action by the Company.
- 9.2.2 Any report of improper conduct made in good faith shall be eligible for protection under this Policy
- 9.2.3 Employee who takes any retaliatory action against any whistleblower who has made a report in good faith shall be subject to disciplinary action

10. Investigation Procedure

10.1 Time

- 10.1.1 Coffex Coffee will acknowledge all whistleblowing reports within five (5) working days in cases where the identity of the employee who committed improper conduct is known. However, in cases where the identity of the employee who committed improper conduct is not known or yet to be known, the five (5) working days will only be counted upon knowing the identity
- 10.1.2 Conclude full investigations within sixty (60) calendar days from initiation subject to extension for complex cases
- 10.1.3 A whistleblower whose identity is known to the Whistleblowing Committee is entitled to receive updates on the progress of the investigation, until an outcome is reached.

10.2 Initial review

- 10.2.1 Whistleblowing Committee will review the report to determine the validity of the report

10.3 Investigation

- 10.3.1 All whistleblowing investigation shall be conducted internally and/ or independently on a strictly confidential basis

10.4 Preliminary Investigation

- 10.4.1 The Whistleblowing Committee will conduct a preliminary investigation of every report of improper conduct received to determine whether there are merits to initiate a full investigation.

- 10.4.2 The findings of the preliminary investigation shall be referred to the Chairman of the Whistleblowing Committee for a decision, whether, to close the case or to proceed to a full investigation.
- 10.4.3 In cases where the preliminary findings disclose a possible criminal offence, the Whistleblowing Committee may decide if the matter should be referred to the relevant authorities, such as the police or the Malaysia Anti-Corruption Commission (“MACC”) for further action. Under s. 25 MACC Act, the discovery of a corruption offence of a criminal nature, must be reported to the authorities.
- 10.4.4 If the matter is closed or the Whistleblowing Committee decides it is not necessary to proceed to a full investigation, the chairman of the Whistleblowing Committee shall inform the whistleblower.
- 10.4.5 If the matter is to be referred to the authorities mentioned in clause 8.3.3, the Chairman of the Whistleblowing Committee shall inform the whistleblower that the matter has been referred to the authorities
- 10.4.6 If full investigation is to be carried out, the Chairman of the Whistleblowing Committee shall inform the whistleblower and the whistleblower shall give full cooperation throughout the conduct of the investigation.

10.5 Full Investigation

- 10.5.1 In the event a full investigation is to be conducted, the Chairman of the Whistleblowing Committee or any other persons identified by the committee shall conduct the investigation and to complete the investigation within sixty (60) days. Any extension of time for investigation shall be subject to the approval of the Chairman of the Whistleblowing Committee.
- 10.5.2 All employees to be involved including the whistleblower shall give full cooperation throughout the conduct of the investigation.
- 10.5.3 To prevent overlap, an independent investigator shall be carried out the investigation involving a member of the Whistleblowing Committee. The investigator shall be independent from the parties making the decision on behalf of the Whistleblowing Committee.
- 10.5.4 In the event of an investigation into improper conduct by the directors of Coffex Coffee, the Whistleblowing Committee will appoint an external independent party to conduct the investigation.
- 10.5.5 The independent investigator shall prepare his/her confidential report and forward it to the HR Department within seven (7) days of completing the investigation. A copy of the confidential report will be given to the Whistleblowing Committee.

10.6 Decision

- 10.6.1 The HR Department, after due consideration of the investigator’s report, but not later than seven

(7) days, will make a decision for the appropriate disciplinary action against the wrongdoers. The decision will be documented in writing together with the grounds of such decision, attached with the report of the investigator.

- 10.6.2 The HR Department will brief the Board of Directors on the findings of the report of improper conduct by the employee, as well as the decisions of the HR Department, before action is taken, and in any case, within 7 days from making its decision.
- 10.6.3 After a discussion with the Board of Directors on the decision of the HR Department, the HR Department may change its decision, but the reasons for such change shall be documented in the minutes of the meeting as well as the records of the Whistleblowing Committee.
- 10.6.4 Any disciplinary actions against any directors or employees shall be in accordance with the Company Handbook. (See paragraph 53, Company Handbook.)
- 10.6.5 In the event the enforcement of the decision of the HR Department is postponed for more than ninety (90) days from the presentation of the findings of the Whistleblowing Committee to the Board of Directors, or otherwise aborted, the Whistleblowing Committee is authorized to bring the matter to the attention of the appropriate authorities, such as the police department and/or MACC.

10.7 Establishment of Whistleblowing Committee

- 10.7.1 Coffex Coffee hereby establishes the Whistleblowing Committee which shall comprise of three to five members, made up of members of the Audit Committee. The Whistleblowing Committee shall be trained in anti-corruption law; investigation techniques; and handling of whistleblowing reports (including anonymous reports). At least one member of the committee must be a non-executive and independent director.
- 10.7.2 Whistleblowing Committee's roles in handling the whistleblowing report are as follows:
 - (a) Members from the Audit Committee will review the whistleblowing reports;
 - (b) The Whistleblowing Committee will appoint an independent investigator for the investigation of the report;
 - (c) The Whistleblowing Committee will keep records of the report of the

investigator, as well as the written decision of the HR department.
 - (d) Whistleblowing Committee will document and preserve evidence presented by the investigation.
 - (e) The Whistleblowing Committee will follow up with the briefing of the Board of Directors and document the enforcement of the decision of the HR department.
 - (f) Whistleblowing Committee will assist in any disciplinary proceedings instituted by the HR Department against the wrongdoer.

10.7.3 The Whistleblowing Committee is authorized to escalate the matter to the authorities in the event the enforcement of the decision is thwarted or postponed indefinitely.

11. Conflict of Interest

The investigation procedures and handling of whistleblowing reports are handled in an unbiased, impartial and objective manner. Any person that is with conflict of interest with a whistleblower's report shall be excluded and shall declare the same to the Chairman of the Whistleblowing Committee.

12. Responsibilities

- 12.1 The Whistleblowing Committee shall oversee report of improper conduct, review, investigate and follow-up actions.
- 12.2 The Human Resources Department shall monitor and keep a close eye on the individuals involved and to carry out the decision made by the Board of Directors or the Whistleblowing Committee.
- 12.3 All individuals involved shall give full cooperation to the investigation.

13. False or Malicious Reports

Knowingly submitting false or malicious reports is a serious offense and may lead to disciplinary or legal action.

14. Review and Amendments

This policy will be reviewed annually or whenever needed to ensure continued compliance and effectiveness. All updates will require approval by the Board of Directors.

15. Whistleblower Protection Act 2010

- 15.1 The Whistleblower Protection Act 2010 was passed in June 2010 by Parliament and came into force on 15th December 2010. The Act protects persons making disclosures of improper conduct in the public and private sector from civil and criminal action.
- 15.2 Whistleblowers are protected under the Act which ensures their identity is kept confidential; protected from lawsuits; and shielded from retaliatory actions.

16. Contact for Enquiries

All enquiries related to the Whistleblowing Policy can be sent to Coffex Coffee's Human Resources Department email at hr.admin@coffexcoffee.com and/ or reachable at 012-3542697.