

FoundPac Group Berhad
Registration No.: 201501040628 (1165946-H)
(Incorporated in Malaysia)

WHISTLE-BLOWING POLICY

1 POLICY STATEMENT

FoundPac Group Berhad (“FPG”) is committed to ensuring high standards of corporate governance, business integrity and accountability in conduct of its business and operations.

As part of good corporate governance, FPG has established a Whistle-Blowing Policy (“WBP” or “this Policy”) that sets out avenues for legitimate concerns relating to FPG and all its subsidiary companies (“FPG Group” or “the Group”) to be objectively investigated and addressed. Individuals are encouraged to raise genuine concerns about illegal, unlawful behaviour or unethical practices in confidence and without the risk of reprisal.

2 OBJECTIVE AND SCOPE

The objective of this WBP is to provide an avenue for all employees of FPG Group (including former employees) and all vendors, contractors, suppliers, consultants, customers and agents of FPG Group and members of the public to raise genuine concerns about any inappropriate, unethical or unlawful behaviour and practices within FPG Group without fear of retaliation and to offer protection for such persons (including the employees of FPG Group) who report such allegations.

Whistle-blowing is a voluntary disclosure of inappropriate, unethical or unlawful behaviour and practices by the management or employees which includes but are not limited to the following:-

- Fraud, theft, misappropriation or embezzlement of FPG Group funds or assets;
- Bribery, corruption or money laundering;
- Criminal breach of trust, abuse of power and position or blackmail;
- Non-compliance with laws, regulations, requirements of statutory bodies or public policies;
- Improper or unethical conduct or behavior;
- Misuse of FPG Group’s properties, assets or resources;
- Unauthorised disclosure or use of confidential information of FPG Group;
- Conflict of interest;
- Non-compliance with FPG Group’s policies and/or procedures;
- Gross omissions, acts or irregularities which are deemed to be against the interests of FPG Group;
- Actions which cause physical danger/harm to another person and/or can give rise to risk of damage to properties/assets or environment;
- Bullying and/or harassment; and
- Any similar accomplice to or deliberate concealment of any or a combination

3 WHISTLEBLOWER PROTECTION

This WBP is designed to offer protection to those who make an allegation, to the extent reasonably practicable, provided the allegation is made in good faith.

The whistleblower shall be accorded with protection of anonymity or confidentiality of identity, unless otherwise required by law. All reports or disclosures or such other details shall be kept confidential.

FPG Group, however, does not extend this assurance to an individual who maliciously raises a matter he/she knows is untrue. If allegations are proven to be malicious or not made in good faith, the parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

Any parties who retaliate against the person who has reported a wrongdoing in good faith may be subject to appropriate action, up to and including legal action, where applicable.

4 CONFIDENTIALITY

FPG Group wishes to assure the safety and confidentiality of the whistle-blower, and therefore undertakes to treat all allegations in a confidential and sensitive manner. A report of the allegation will only be disclosed to those individuals who have a need to know in order to properly carry out an investigation of the allegation.

All concerns raised will be treated fairly, properly and confidentially.

5 PROCEDURE IN MAKING A DISCLOSURE

An employee's concerns about any alleged wrongdoing or improper conduct should be reported to his or her superior. If for any reason the employee finds it difficult or inappropriate to report his or her concerns to a superior, the employee may report the concerns through the whistle-blowing channels.

Any report / disclosure about the alleged wrongdoing or improper conduct should be directed to the Chief Executive Officer (CEO), Dato' Ong Choon Heng, ongch@foundpac.com.

In the case where reporting to the management is not possible or appropriate, then the report / disclosure should be directed to the Chairman of Audit Committee, feedback@foundpac.com

To facilitate an investigation into the alleged wrongdoing or improper conduct, where possible and applicable, the following information should be included when making a disclosure:

- a) Brief description of the misconduct;
- b) The date and location of the incidence;
- c) The identity of the wrongdoer;

- d) Particulars of witnesses, if any;
- e) Supporting evidence and/or documents; and
- f) Any other details deemed useful to facilitate investigation and actions

Where possible, the whistleblower is encouraged to disclose his/her personal details to enable the relevant parties conducting the investigation to contact the whistleblower for further information:

- a) Name; and
- b) Contact details - email address and/or telephone number.

Any anonymous disclosure will not be entertained. However, the Group reserves its right to investigate into any anonymous disclosure.

Where relevant, the individual may be requested to submit evidences and documents. Any meeting arranged will be conducted discreetly and if necessary, off-site or out of the office premises.

6 REVIEW OF POLICY

The WBP shall be subject to review and amendment as and when necessary to ensure that it continues to remain relevant and appropriate.

The WBP was last reviewed and adopted by the Board of Directors on 27 May 2025.