

COMPANY APPROVED PROCEDURE		CAP	
TITLE: WHISTLEBLOWING PROTECTION PROCEDURE	Doc. No:	CAP13-014	
	Issue:	A	

	PREPARED BY	APPROVED BY	QA RELEASE
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DESIGNATION	Executive	Certified Integrity Officer	QA DCC
DATE	04.02.2025	04.02.2025	

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1. OBJECTIVE

This Whistleblowing Protection Procedure aims to establish a safe, confidential, and effective mechanism for employees, internal and external stakeholders, and the public to report genuine concerns about unethical, illegal, or improper conduct within Composites Technology Research Malaysia Sdn Bhd and its subsidiaries (CTRM Group), without fear of retaliation.

2. SCOPE

The procedure applies to:

- a) Board of Directors.
- b) Senior Management.
- c) All employees of CTRM and CTRM Group, regardless of rank or role.
- d) Business associates and third parties.
- e) Any individual interacting with CTRM Group who wishes to report any improper conduct or wrongdoing.

3. REFERENCES

This Procedure shall be read together with the following guidelines:

- a) Whistleblower Protection Act 2010 (Act 711).
- b) Malaysian Anti-Corruption Commission (MACC) Act, 2009 (Act 694) and amendments.
- c) Guidelines on Adequate Procedures Pursuant to the Subsection [5] of Section 17A under the MACC Act, 2009, issued by the Prime Minister's Department (10 December 2018).
- d) DRB-HICOM Group's Whistleblowing Policy.
- e) Anti-Bribery and Anti-Corruption (ABAC) Policy.
- f) Code of Conduct.
- g) All other relevant documented policies and procedures of CTRM Group

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4. ABBREVIATION / DEFINITION

4.1 Abbreviation

4.1.1	ABAC	Anti-Bribery and Anti-Corruption
4.1.2	CTRM Group	Composites Technology Research Malaysia Sdn. Bhd. and its subsidiaries: 1. CTRM Aero Composites Sdn. Bhd. 2. CTRM Testing Laboratory Sdn. Bhd. 3. CTRM Composites Engineering Sdn. Bhd.
4.1.3	RIC	Risk, Insurance, Incentive, Integrity, Compliance & Continuity

4.2 Definition

Board of Directors	Any person occupying the position of a director of CTRM Group by whatever name called and includes a person in accordance with whose directions or instructions the majority of directors of CTRM Group are accustomed to act, and an alternate or substitute director.
Bribery	Offering, promising, giving, accepting, or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.
Business Associate	External party with whom CTRM Group has, or plans to establish, some form of business relationship. Business Associate includes, but not limited to clients, customers, outsourcing providers, contractors, vendors, consultants, suppliers, distributors, agents, and representatives.
Corruption	Act of giving or receiving of any gratification or reward in the form of cash or in-kind of high value for performing a task in relation to his/her job description.
Employees	Employees of the Company, as well as contracted staff.
Enforcement Authority	Any government agency responsible for the enforcement of the laws e.g., Malaysian Anti-Corruption Commission (MACC), Royal Malaysian Police, etc.

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Improper Conduct	Any conduct which if proved, constitutes a disciplinary offence or a criminal offence.
Third Party	Person or body that is independent of the CTRM Group.
Senior Management	The highest level of management team in an entity, led by the CEO and his direct reports.
Whistleblower	Any person who makes a disclosure of improper conduct to the enforcement agency under Section 6 of Whistleblower Protection Act, 2010 (Act 711).
Whistleblowing Channels	Any medium of communication that provides an additional avenue to report or disclose any attempted, suspected, and actual bribery or corruption, as well as any other improper conduct (e.g. whistleblowing hotline, e-mail, letter, mailbox, etc.). Any report or disclosure through whistleblowing channels will be dealt in confidential manners, to protect the identity of the reporter and of others involved or reference in the report.

5. RESPONSIBILITY

The ABAC Working Committee and/or Head of RIC are responsible to review and approve this documented Whistleblowing Protection Procedure prior to its issuance (and subsequent revision, if any).

6. PROCEDURE

6.1 What to Report

Examples of **improper conduct** or reportable concerns include, but are not limited to:

- Suspected, attempted, or actual incidences of bribery, corruption, or fraud.
- Misuse/Embezzlement/Misappropriation of company funds or assets.
- Abuse of power/authority.
- Breach of trust.

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- e) False claims and/or forgery of documents.
- f) Harassment, discrimination, extortion, or unethical workplace practices.
- g) Suspected, attempted, or actual conduct or activity, which violates any laws or regulations of Malaysia.
- h) Suspected, attempted, or actual breach of the Company's policies, codes, standard operating procedures, work instructions, or guidelines.
- i) Any other detrimental wrongdoings or improper conduct.

6.2 Information Required

Whistleblower submits a detailed disclosure, including:

- a) Type of activity or conduct.
- b) Details of suspected personnel or party involved.
- c) Details of incident (including place, date, and time of incident, as well as names of those involved).
- d) Transaction amount and type (if it known).
- e) Any document, information, or physical evidence relating to the report or complaint.

6.3 Reporting Channels

CTRM adopts the DRB-HICOM Group's Whistleblowing Policy to provide an additional avenue for reporting or disclosing any attempted, suspected, or actual bribery, corruption, or other improper conduct. Reports or disclosures will be handled confidentially to protect the identity of the whistleblower and others involved.

Whistleblowers can report concerns through any of the following DRB-HICOM Group's whistleblowing channels:

- **Dedicated Whistleblowing Hotline:** 1-800-88-2005
- **Email:** whistleblowing@drb-hicom.com
- **In Writing:** Chief Internal Audit & Integrity Officer

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Group Internal Audit & Integrity Division,
Level 5, Wisma DRB-HICOM,
No. 2, Jalan Usahawan U1/8, Seksyen U1,
41500 Shah Alam, Selangor.

- **Whistleblowing Mailbox:** Located at Level 1 and Level 5 of Wisma DRB-HICOM

6.4 Confidentiality and Anonymity

- 6.4.1 Whistleblowers have the right to report concerns without fear of reprisal/retaliation.
- 6.4.2 Whistleblowers may report anonymously however, providing contact information is encouraged to facilitate follow-up. While anonymous reporting is permitted, it may limit the effectiveness of the investigation.
- 6.4.3 All reports, whether anonymous or named, will be treated with the highest level of confidentiality.
- 6.4.4 CTRM prohibits retaliation against whistleblowers. Any form of retaliation (e.g. dismissal, demotion, harassment, threats, discrimination, etc.) against a whistleblower is strictly prohibited and may result in disciplinary action.
- 6.4.5 Whistleblowers who intentionally make malicious or false reports may face disciplinary actions, including termination of employment, depending on the severity of the act.

6.5 Whistleblower Protection

- 6.5.1 Under the Whistleblower Protection Act 2010, the whistleblower is entitled to:
- All reports/complaints/concerns will be treated with strict confidentiality to protect the whistleblower's identity.
 - Immunity from civil, criminal or disciplinary actions resulting from the disclosure.

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c) Protection against detrimental action such as dismissal, demotion, harassment or victimisation.

6.5.2 The protection is applicable only if the disclosure:

- a) Is made in good faith or on the basis of a reasonable belief.
- b) Relates to improper conduct within CTRM Group.
- c) Is made to an authorised recipient designated under DRB-HICOM Group's Whistleblowing Policy and channels.

6.6 Investigation and Outcome

6.6.1 An independent investigator or team from the DRB-HICOM Group, such as the Group Internal Audit & Integrity Division, will carry out a comprehensive investigation, maintaining strict confidentiality at every stage of the process.

6.6.2 The findings will be presented to the relevant authority. Appropriate actions, including disciplinary or legal measures, will be taken if the improper conduct/misconduct is substantiated.

6.6.3 CTRM Group is responsible to lodge report on any breach or violation to ABAC laws and regulations, involving any of its Board of Directors, Senior Management, employees, business associates or third parties to the relevant enforcement authorities.

6.7 Roles and Responsibilities

6.7.1 Senior Management

- i) Promote a culture of integrity and transparency by encouraging ethical behavior and fostering an environment where reporting concerns is supported and valued.
- ii) Ensure the whistleblowing procedure is communicated to all employees and stakeholders, internally and externally.
- iii) Take swift and fair action against proven improper conduct/misconduct.

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6.7.2 Employees and Stakeholders

- i) Avoid making public accusations before going through the appropriate channels.
- ii) Provide honest and accurate information when reporting, and ensure that concerns are raised in good faith or on the basis of a reasonable belief.
- iii) Refrain from engaging in retaliation against whistleblowers.

7. RECORDS

(Not applicable)

8. APPENDIX

(Not applicable)

9. AMENDMENT RECORDS

Issue	Date	Description	Amendment by
A	04 Feb 2025	First issued.	Wan Zamakhshari