



WHISTLEBLOWING POLICY



1. Background

Tomy Pak Holdings Berhad ("**Tomy Pak**" or "**the Company**") is dedicated to upholding honesty, integrity, and high ethical standards in its business operations. By promoting openness, transparency, and accountability, the Company ensures good corporate governance and stakeholder protection.

This Whistleblowing Policy ("**Policy**") is designed to encourage directors, employees, contractors, consultants, agents, suppliers, and other stakeholders to report in good faith, any suspected or actual misconduct, illegal or unethical practices, or any violations of the Company's policies, including the Anti-Bribery and Anti-Corruption Policy, without fear of retaliation or adverse consequences.

2. Scope

This Policy is applicable to all directors, employees, contractors, consultants, agents, suppliers, and other stakeholders of the Company and its subsidiaries ("**Covered Parties**").

3. Objectives

The objectives of this Policy are to:

- Provide clear guidance on the process of reporting suspected or actual misconduct, illegal or unethical practices, or violations of the Company's policies.
- Establish a confidential and secure reporting channel for whistleblowers.
- Protect whistleblowers from retaliation or adverse consequences.
- Ensure proper investigation and resolution of reported concerns.

4. Definitions

4.1 Whistleblowers

Whistleblowers are individuals who report improper or illegal activities within the Company. They are often employees but can also be other associated parties such as shareholders, vendors, contractors, customers, or the general public.

4.2 Whistleblowing Committee

The Whistleblowing Committee is responsible for managing a whistleblower's report, including receiving, reviewing, and investigating alleged misconduct or unethical practices. The Committee ensures fair, unbiased investigations while protecting the whistleblower's confidentiality and preventing retaliation. The Committee also provide updates to the Audit Committee or Board of Directors and recommend appropriate actions when needed. The committee comprises of at least two independent directors.



4.3 Good Faith

Good Faith refers to reporting without malice or consideration of personal interest. A whistleblower demonstrates good faith if they reasonably believe that misconduct or improper activities are taking place.

4.4 Reportable Matters

Reportable matters refer to any suspected or actual misconduct, illegal activities, or unethical practices within Tomypak that warrant investigation and resolution. These matters may include violations of the company's policies, potential risks to the business, or any actions that compromise the Company's commitment to honesty, integrity, and ethical standards.

The Company encourages the reporting of any concerns, including, but not limited to:

- Fraud, theft, or misappropriation of the Company's assets.
- Bribery, corruption, or any violation of the Company's Anti-Bribery and Anti-Corruption Policy.
- Insider trading, market manipulation, or other violations of securities laws.
- Unlawful or unethical business practices, including unfair competition, collusion, or antitrust violations.
- Health, safety, or environmental violations or risks.
- Workplace harassment, discrimination, or other misconduct.
- Misleading or falsifying financial records or statements.
- Non-compliance with legal, regulatory, or contractual obligations.
- Any attempt to conceal, destroy, or tamper with evidence related to any of the above matters.

4.5 Exclusions from Reportable Matters

This Policy is not designed to handle employee complaints related to job performance or working conditions. Any reports of this nature will be dismissed and should be reported through the grievance channel as outlined in the Grievance Policy. The primary focus of this policy is to address instances of misconduct, illegal actions, or unethical practices that require investigation and resolution.

5. Confidentiality and Protection of Whistleblowers

The Company ensures confidentiality and prohibits retaliation against those reporting in good faith, subject to legal or investigative needs. Employees engaging in retaliation will face disciplinary action, including but not limited to, termination. A whistleblower who experiences retaliation should promptly report it via the grievance reporting channel as per the Grievance Policy.



6. Reporting Methods

The Company has established a confidential and secure reporting channel for whistleblowers. Concerns can be reported using the information below.

- Attention to Whistleblowing Committee Member: [Name of the designated Independent Director]
- Email: whistleblower@tomypak.com.my
- By Post: [Name of the designated Independent Director], Tomypak Holdings Berhad, No.11, Jalan Tahana, Kawasan Perindustrian Tampoi, 80350 Johor Bahru, Johor Darul Takzim, Malaysia

Reports should include as much relevant information as possible, including details of the suspected or actual misconduct, the parties involved, relevant dates, locations, and any supporting evidence.

Whistleblowers are required to provide their names and contact details to facilitate investigations and follow-up actions.

7. Investigation and Resolution

- The Whistleblowing Committee will acknowledge receipt of reported violations and request the whistleblower to self-identify by providing a Whistleblowing Form (see Appendix A) to complete.
- The Committee will convene to discuss the report and determine the appropriate course of action based on the violation's nature and severity. Minor offenses may be resolved via email, while major issues may necessitate a full-scale inquiry.
- The Committee will ensure investigations utilize suitable channels, resources, and expertise.
- The Whistleblowing Committee will provide quarterly updates to the Audit Committee on received reports and ongoing investigations.
- All information disclosed during investigations will remain confidential, accessible only on a need-to-know basis, except where required for investigation or remedial action, or as mandated by applicable law.
- If an investigation confirms the occurrence of improper activity or misconduct, the Whistleblowing Committee will report the incident to the Board or management for appropriate disciplinary action.
- Following the Committee's decision, if the accused party disagrees with the findings, they will have the right to appeal the decision. The appeal will need to be lodged legally, initiating a process where the case may be presented to a court of law. The outcome will then be determined by the court based on the evidence presented.
- To assure whistleblowers that their report has been addressed, the Committee will, subject to legal constraints, provide them with pertinent information about the investigation's outcome within a reasonable timeframe.
- The Company will keep a record of all reported concerns, investigations, and resolutions for a minimum of seven (7) years to support audits, regulatory inspections, and internal assessments.



8. Responsibilities

- Tomypak's Board of Directors is responsible for overseeing the implementation and effectiveness of this Policy and ensuring that it is reviewed and updated periodically.
- The Company's management is responsible for promoting a culture of openness, transparency, and accountability and ensuring that employees and other stakeholders are aware of and understand this Policy.
- Employees and other stakeholders are responsible for reporting any suspected or actual misconduct, illegal or unethical practices, or violations of the Company's policies in accordance with this Policy.

9. Enforcement and Disciplinary Action

Any employee who is found to have violated this Policy or engaged in retaliation against a whistleblower may be subject to disciplinary action, up to and including termination of employment.

Any contractor, consultant, agent, supplier, or other stakeholder who is found to have violated this Policy may be subject to appropriate remedial actions, including termination of business relationships and legal proceedings.

10. Communication and Training

The Company will communicate this Policy to all employees, contractors, consultants, agents, suppliers, and other stakeholders and provide necessary training and guidance to ensure their understanding and compliance.

The Company will also make this Policy publicly available on its website and include relevant information in its annual reports and other public disclosures as required by applicable laws and regulations.

11. Review

This Whistleblowing Policy has been updated from its previous version dated 23 August 2022 and will be periodically reviewed by Tomypak's Board of Directors to ensure its continued relevance, effectiveness, and compliance with applicable laws, regulations, and industry standards. The Policy may be amended from time to time as deemed necessary by the Company's Board of Directors.

12. Appendix

Appendix A - Whistleblowing Form