Whistleblowing Policy Statement

Policy Statement

DXN Holdings Bhd. and its subsidiaries ("DXN Group" or "the Group") are committed to the highest standards of integrity, openness, and accountability in conducting their businesses and operations. The Group aspires to conduct its affairs in an ethical, responsible, and transparent manner.

In line with these values, DXN Group provides an avenue for all company employees and members of the public to report any improper conduct within the company.

Objective of the Policy

This policy provides an avenue for all employees of DXN Group and members of the public to report any improper conduct in accordance with the procedures provided under this policy. It also offers protection for employees and members of the public who report such allegations in good faith.

Scope of the Policy

This policy is designed to facilitate employees and members of the public in reporting any improper conduct (misconduct or criminal offence) through internal channels. Examples of such misconduct or criminal include:

- i. Fraud;
- ii. Bribery;
- iii. Money Laundering
- iv. Abuse of Power;
- v. Conflict of Interest;
- vi. Theft or Embezzlement;
- vii. Misuse of Company Property;
- viii. Non-Compliance with Procedure.

This list is not exhaustive and includes any act or omission that, if proven, will constitute misconduct under DXN Group's Code of Conduct and Ethics or a criminal offence under relevant legislation. This policy does not invalidate the Grievance Procedure and/or the Disciplinary Action Process and Procedures (DAPP) but provides additional avenues for employees and members of the public to report improper conduct committed or about to be committed within the company. Other procedures, as outlined in the Collective Agreements, Employee Handbook, and Code of Conduct and Ethics, shall continue to operate concurrently.

Applicability of the Policy

This Policy applies to every employee, director, and officer of DXN Group. Joint venture companies in which DXN Group is not a controlling stakeholder, as well as associate companies of DXN Group, are encouraged to adopt this policy. Members, Contractors, agents, outsourced workers, and business associates are

required to act consistently with applicable parts of this Policy when dealing with, acting on behalf of, or representing DXN Group. This policy also applies to members of the public, where relevant.

Procedure for Making a Disclosure

All disclosures are to be reported via a secure and confidential channel, in accordance with the procedures provided under this policy.

Protection for Whistleblower

A whistleblower will be granted confidentiality of identity to the extent reasonably practicable. In addition, an employee who reports misconduct internally will also be protected against any adverse and detrimental actions for disclosing any improper conduct within DXN Group, provided the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the whistleblower was mistaken about the facts or the rules and procedures involved.

Anonymous Whistleblower

Any employee or member of the public who wishes to report misconduct is not required to disclose their identity and may remain anonymous.

Notification

When you report a concern, you can expect that it will be treated seriously, fairly, and promptly. Updates may be provided during and upon completion of our investigation, unless such disclosure could compromise the investigation.

DXN Group reserves the right to amend this policy from time to time.

Datuk Lim Siow Jin,
Executive Chairman of DXN Group

1 November 2024