



Whistleblowing Policy

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Ehsan Bina Group of Companies, including Ehsan Bina Sdn. Bhd., Binavest Sdn. Bhd., Foresthill Damansara Land Sdn. Bhd., and its subsidiaries, affiliates, related and associated companies (collectively referred to as “EB Group”, “the Company”, “we”, “us” or “our”), is committed to maintaining a safe, transparent and ethical working environment.

This Whistleblowing Policy (“Policy”) provides a structured mechanism for employees and relevant third parties to report actual or suspected wrongdoing relating to the Company’s operations. Reports will be handled promptly, confidentially and fairly, while safeguarding the rights of individuals involved.

1. PURPOSE

The purpose of this Policy is to provide a safe, transparent and accessible mechanism for raising concerns about actual or suspected wrongdoing, and to ensure that disclosures are assessed and addressed consistently, impartially and in accordance with applicable laws.

2. SCOPE

This Policy applies to:

- All employees of the Company, regardless of position, level or employment status.
- Third parties, including contractors, vendors, suppliers, consultants and business partners, who may become aware of misconduct in relation to Company operations.
- All forms of actual or suspected misconduct, including fraud, theft, bribery, corruption, harassment, discrimination, abuse, breaches of Company policies or regulations, health, safety or environmental violations, misuse of Company property, confidential information or intellectual property, and any act that is illegal, unethical or detrimental to the Company’s interests.
- Reports relating to any subsidiary, office, project site, sales gallery or business activity.

3. DEFINITIONS

- Whistleblowing:** Disclosure of information about actual or suspected wrongdoing in good faith.
- Whistleblower:** A person who makes a disclosure under this Policy in good faith.
- Respondent:** The person or persons against whom an allegation is made.
- Investigating Officer:** HR, Compliance or designated personnel responsible for assessing and investigating disclosures.

4. GUIDING PRINCIPLES

- Good Faith Reporting:** Disclosures must be made honestly and without malicious intent.
- Confidentiality:** Reports will be treated with the highest level of confidentiality, with information disclosed only to persons directly involved in handling or investigating the matter, subject to the need for a fair investigation and applicable law.
- Non-Retaliation:** Retaliation against individuals who raise genuine concerns under this Policy is strictly prohibited.
- Fair Investigation:** Concerns will be assessed and investigated promptly, objectively and fairly.
- Accountability:** Employees and Management share responsibility for upholding ethical conduct and supporting a culture of openness.



5. REPORTING CHANNELS

The Company provides the following channels for submitting a whistleblowing report:

- i) **Dedicated Whistleblowing Email:** whistleblow@ehsanbina.com.
- ii) **Direct Reporting:** To HR, an immediate or intermediate supervisor, HOD or any member of Senior Management.
- iii) **Written Report:** Submit a written report in a sealed envelope marked "STRICTLY CONFIDENTIAL – WHISTLEBLOWING", addressed to HR or the Compliance Officer.
- iv) **Chairman of the Audit Committee:** Where reporting to Management may present a concern, the report should be made directly to the Chairman of the Audit Committee. Such reports shall receive the same confidentiality and protection under this Policy.
- v) **Anonymous Reporting:** Reports may be submitted anonymously. The whistleblower is encouraged to provide sufficient details and supporting information to enable effective assessment and investigation.

6. INFORMATION TO INCLUDE IN A REPORT

To support effective assessment and investigation, a report should include, where available:

- A clear summary of the issue or suspected misconduct.
- The date, time and location of the alleged incident(s).
- The identity or role of individuals involved, if known.
- Supporting documents, evidence or names of witnesses, if available.
- The whistleblower's relationship to the incident.

7. ASSESSMENT AND INVESTIGATION PROCESS

- i) **Acknowledgement:** The Company shall acknowledge receipt of a report within five (5) working days, where possible.
- ii) **Preliminary Review:** HR, Compliance or the designated Whistleblowing Committee shall review the report to determine its apparent validity and scope and whether further investigation is required.
- iii) **Formal Investigation:** Where necessary, an impartial investigation team shall be appointed to gather facts, interview witnesses and review documentation. Persons handling the matter shall, as far as practicable, be independent of the subject matter and individuals involved.
- iv) **Outcome and Action:** Findings shall be reviewed by Senior Management or the Audit Committee, as appropriate. Corrective, disciplinary or other appropriate action shall be taken based on the findings and applicable Company procedures.
- v) **Feedback:** The whistleblower will be informed of the outcome, where practicable, subject to confidentiality requirements, privacy considerations and legal limitations.

8. PROTECTION OF WHISTLEBLOWERS

A whistleblower who makes a disclosure in good faith under this Policy will not be subjected to retaliation, dismissal, demotion, harassment or discrimination for making the disclosure.

- The whistleblower's identity shall be kept confidential to the fullest extent possible, consistent with the need to conduct a fair investigation and comply with applicable law.
- Protection under this Policy may not extend to, or may be withdrawn from, a whistleblower where it is found that the whistleblower participated in the improper conduct disclosed; knowingly made a false or malicious allegation or material statement; made a frivolous or vexatious disclosure; principally questioned the merits of Company policy rather than reported improper conduct; or made the disclosure solely or substantially to avoid dismissal or other disciplinary action.
- Any alleged retaliation or breach of confidentiality should be reported promptly through the channels provided under this Policy.

9. RELATIONSHIP WITH OTHER STATUTORY PROTECTIONS

This Policy operates as the Company's internal reporting mechanism and applies in addition to, and independently of, other statutory whistleblowing and reporting protections available under Malaysian law.

- The Whistleblower Protection Act 2010 (Act 711) provides statutory protection in circumstances specified under that Act. The Company's internal reporting channels under this Policy should not be assumed, by themselves, to confer statutory protection under Act 711. A whistleblower who wishes to obtain statutory protection under Act 711 should make, or also make, a disclosure directly to the relevant enforcement agency.
- Section 587 of the Companies Act 2016 provides protection for an officer of a company who, in the course of performing his duties, has reasonable belief of a matter which may constitute a breach of that Act or its regulations, or reason to believe a serious offence involving fraud or dishonesty has been, is being, or is likely to be committed against the Company or that Act, and who reports the matter in writing to the Registrar of Companies. Under that section, the Company must not remove, demote, discriminate against or interfere with the lawful employment of the reporting officer by reason of the report, and the officer is not liable to be sued in any court or subjected to disciplinary action for a report made in good faith in the intended performance of his duties. This protection applies specifically to reports made to the Registrar of Companies and does not extend to reports made through other channels.
- Once the Company is listed, Section 321 of the Capital Markets and Services Act 2007 provides that the Company shall not remove, discriminate against, demote, suspend or interfere with the lawful employment of its chief executive, any officer responsible for preparing or approving financial statements or financial information, its internal auditor, or its company secretary, where that person, in good faith and in the course of performing his/her duties, reports a reasonable belief of any matter which may or will constitute a breach or non-performance of any requirement or provision of the securities laws or a breach of stock exchange rules, or any matter materially affecting the Company's financial position, to the Securities Commission or the relevant stock exchange. Such person is also not liable to be sued in any court for a report made in good faith in the intended performance of his duties. This protection is limited to the specific office-holders named above and does not extend to employees generally.

10. CONFIDENTIALITY AND RECORD MANAGEMENT

All reports, supporting documents, investigation records, findings and outcomes shall be handled confidentially and access shall be restricted to authorized personnel with a legitimate need to know.

- HR / Compliance shall maintain a confidential register of whistleblowing reports, investigations and outcomes.
- Records shall be securely stored, accessed, retained and disposed of in accordance with the Company's applicable record-management and data-protection requirements.
- Information may be disclosed where required by law, by a competent authority, or where necessary for a fair investigation or appropriate action.

11. COMPLIANCE AND MONITORING

HR / Compliance shall oversee the implementation of this Policy and maintain records necessary to monitor its operation.

- Periodic reports on whistleblowing matters, anonymized where appropriate, shall be submitted to Senior Management or the Board for oversight.
- Awareness programmes shall be conducted to ensure employees understand their rights and obligations under this Policy.
- The Policy and its implementation shall be reviewed periodically, including following significant cases or identified control weaknesses.

12. NON-COMPLIANCE

Employees found to have committed misconduct as a result of an investigation may be subject to disciplinary action, including dismissal, and possible legal action, in accordance with Company procedures and applicable laws.

- Employees who retaliate against whistleblowers or improperly disclose confidential information may be subject to disciplinary measures.
- The Company reserves the right to refer suspected fraud, corruption or other criminal offences to relevant authorities and to pursue legal remedies where appropriate.

13. POLICY REVIEW AND AMENDMENTS

This Policy shall be reviewed periodically and when required by changes in applicable laws, regulatory requirements, business operations or lessons arising from reports and investigations. Amendments shall be subject to the Company's approval process. The latest approved version shall be maintained by the Policy Owner and published through the Company's designated communication channels.