

## Whistleblowing Policy

### Purpose

The purpose of this Whistleblowing Policy ("the Policy") is to govern the reporting of improper conduct at DFCITY Group Berhad (the Company and its subsidiaries), ("DFCITY Group" or "the company"). This Policy aims to provide a platform for employees to raise concerns and reassurance that they will be protected from victimization of whistleblowing. This policy was written with reference to protection under the Whistleblower Protection Act 2010.

### Scope

This Policy applies to all employees of DFCITY Group. All employees (including permanent, contract or part-time), directors (executive or non-executive), shareholders and other stakeholders are encouraged to disclose any improper conduct that may adversely impact the Company.

### Policy Statement

- a. Employees and other stakeholders are encouraged to make any report or disclosure, in good faith, and all concerns or complaints raised will be treated fairly.
- b. All complaints or disclosure must be raised without malice and in good faith. The individual must reasonably believe that the information disclosed are substantially true and have sufficient evidences. The complaint or disclosure must not be made for the purposes of personal gain.
- c. The Company will ensure the individual who raises the complaint or disclosure will not be penalized, will not suffer from harassment or detrimental treatment.
- d. The whistle blower is required to identify himself or herself in his or her report. This will facilitate the investigator to obtain further clarification or information and to convey the investigation results to the whistle blower.
- e. Any person/ party that is implicated will be totally abstained from deliberation.

### Improper Conduct

Improper conduct under this Policy means:

- Misappropriation of monies;
- Misrepresentation;
- Violation of laws and regulations;
- Breach of the Company's policies, practices and procedures;
- Endangerment of public health and safety;
- Criminal offence;
- Improprieties in matters of financial reporting;
- Dishonest or fraudulent act;
- Misuse of Company's information; and
- Any other detrimental wrongdoing which nature is subject to absolute discretion of the Company.

**Evidence**

- a. The whistle blower should report or disclose in writing, information regarding the types of activities, and identify who is (are) involved and when it occurred.
- b. The whistle blower must provide information of the facts. Any information obtained from third party will not be entertained.

**Channel of Report**

- a. The whistle blower should promptly report the improper conduct information to the Chairman of Audit Committee in writing or email at [whistleblowing@dfcitygroup.com.my](mailto:whistleblowing@dfcitygroup.com.my).
- b. The report or disclosure should be sealed in an envelope marked as "Private and Confidential" and mailed to:

**Mr. Chong Peng Khang**  
Chairman of Audit Committee  
DFCITY Group Berhad.  
No. 60-1, Jalan Lagenda 5  
Taman 1 Lagenda  
75400 Melaka, Malaysia

- c. The Audit Committee is responsible for investigating and making appropriate recommendations to the Board in respect to all reported concerns.
- d. Audit Committee will take actions including following up in writing to the whistle blower for complete closure of the report.
- e. The Audit Committee has the authority to obtain legal advice, consultants, private investigators or other resource to conduct a thorough investigation of the allegations.
- f. Anonymous reporting may be accepted if there are adequate supporting evidences. However, should the report be done in bad faith, the report will be ignored.

**Review of the Policy**

This Policy will be reviewed and updated by the Board or the Audit Committee in accordance to the needs, among other reasons to maintain compliance with the laws and regulations. Any update of this Policy shall be effective after it is circulated to all employees of the Company in writing.

This whistleblowing policy was revised and approved by the Board on 31 May 2022