

WAJA KONSORTIUM BERHAD

Registration No.: 200301016513 (618933-D)
(Incorporated in Malaysia)

WHISTLEBLOWING POLICY (Revised on 28 May 2025)

1. INTRODUCTION

Practice 3.2 of the Malaysian Code on Corporate Governance (“**MCCG**”) stipulates that the Board establishes, reviews and together with management implement policies and procedures on whistleblowing.

In addition, Guidance 3.2 of the MCCG stipulates that the Board should encourage employees to report genuine concerns in relation to breach of a legal obligation (including negligence, criminal activity, breach of contract and breach of law), miscarriage of justice, danger to health and safety or to the environment and the cover-up of any these in the workplace.

The Board of Directors (“**Board**”) of Waja Konsortium Berhad (Formerly known as ConnecCounty Holdings Berhad) (“**the Company**”) will ensure that its Whistleblowing Policy (“**Policy**”) sets out avenues where legitimate concerns can be objectively investigated and addressed. Individuals should be able to raise concerns about illegal, unethical or questionable practices in confidence and without the risk of reprisal.

This Policy also extends its protection and reporting avenues to external parties including suppliers, customers, and other third parties who are engaged with the Company. It is intended to promote a transparent and accountable environment where wrongdoing can be reported in good faith without fear of retaliation.

2. SCOPE OF THE POLICY

2.1 This Policy covers possible improper conduct such as:-

- (a) Fraud;
- (b) Corruption, bribery or blackmail;
- (c) Criminal offences;
- (d) Theft or embezzlement;
- (e) Abuse of power;
- (f) Conflict of interest;
- (g) Misuse of the Waja Group’s property;
- (h) Insider trading;
- (i) Money laundering;
- (j) Breach of legal obligation (including negligence, criminal activity, breach of contract and breach of law);
- (k) Miscarriage of justice;
- (l) Endangerment of an individual’s health and safety or of the environment; and
- (m) Concealment or cover-up of any of the above.

2.2 The improper conduct above is not exhaustive and includes any other act or omission, which if proven, will constitute an act of misconduct under *Code of Conduct and Ethics for Directors*, disciplinary offence under the relevant policies and procedures of the Company or criminal offence under relevant legislations in force.

2.3 The Company expects all parties to act in good faith with a reasonable belief that the information and allegations are substantially true.

2.4 If allegations are proven to be malicious, parties responsible may be subject to appropriate action, up to and including legal action, where applicable.

2.5 All confidential reporting or disclosures by a whistleblower are to be directed to the designated person in accordance with the procedures under this Policy.

- 2.6 The Policy is not intended as a means for employees to pursue personal grievances which should be referred directly to their immediate superiors.

3. PROTECTION TO WHISTLEBLOWER

- 3.1 The Company will take all reasonable steps to protect the confidentiality of the identity of a whistleblower, to the extent reasonably practicable and will adhere to any statutory requirements in force.
- 3.2 Any employee of the Company who whistleblows will also be protected against any adverse and detrimental actions in reprisal for disclosing any improper conduct committed or about to be committed within the Company and its Group of Companies ("**the Group**"), to the extent reasonably practicable, provided that the disclosure is made in good faith.
- 3.3 Such protection will continue notwithstanding that the investigation later reveals that the whistleblower is mistaken as to the facts, rules and procedures of improper conduct.
- 3.4 The whistleblower remains liable for his/her own conduct and is responsible to ensure that disclosure is made in good faith and free from any malicious intent. The Company does not have the power to offer any person immunity against prosecution in the criminal jurisdiction.
- 3.5 The Company may revoke the protection accorded to a whistleblower under the following circumstances, amongst others:-
- (a) the whistleblower participated in the improper conduct;
 - (b) the whistleblower willfully discloses a false statement;
 - (c) the disclosure is made with malicious intent;
 - (d) the disclosure is frivolous or vexatious; or
 - (e) the disclosure is made solely or substantially with the motive of avoiding dismissal or other disciplinary action
- 3.6 The Company reserves the right to take disciplinary action, including dismissal or termination of contracts, against any party who retaliates to a whistleblower.

4. ANONYMOUS WHISTLEBLOWER

- 4.1 The Company will not entertain any anonymous disclosure. The person who wishes to whistleblow any improper conduct within the Group is required to disclose his/her name, identity number and contact number. Nonetheless, these identity details will be kept confidential to accord protection to the whistleblower.
- 4.2 However, the Company reserves its right to investigate into any anonymous disclosure.

5. REPORTING PROCEDURES

- 5.1 All disclosures are to be channelled in accordance with the procedures provided herein.
- 5.2 Anyone with genuine concerns in relation to unethical behaviour, malpractices, illegal acts or failure to comply with regulatory requirements may forward his/her report to the designated persons as provided below (where applicable):-

For matters relating to financial reporting, unethical or illegal conduct, one can report directly to the following designated person:-

Audit Committee Chairperson

Ms. Thong Mei Mei at email address: ctwmei@gmail.com

For employment-related concerns, one can report directly to the following designated person:-

Executive Director

Ms. Peh Jia Yau at email address: alice.peh@waja.my

For any concerns from the shareholders/stakeholders, one can email to the following designated person:-

Independent Non-Executive Chairman

Major General Dato' Mamat Ariffin Bin Abdullah at email address: maa@mfdm.com.my

- 5.3 As it is essential for the Company to have all critical information in order to be able to effectively evaluate and investigate a complaint, the disclosures made herein should provide as much details and be as specific as possible. The disclosures should contain the following information:-
- (a) Details of the person(s) involved;
 - (b) Details of the allegations such as nature, time and place;
 - (c) Other relevant information; and
 - (d) Any supporting evidence.
- 5.4 All disclosures received will be treated with confidence and every effort will be made to ensure that confidentiality is maintained throughout the process.
- 5.5 At the appropriate time, the whistleblower making the disclosures may need to come forward as a witness.

6. HANDLING OF COMPLAINTS

- 6.1 The Chairperson of the Audit Committee may direct the complaint to the division/department best placed to address it, or lead the investigation to ensure prompt and appropriate investigation and resolution. All information disclosed during the course of an investigation will remain confidential, except as necessary or appropriate for the conduct of the investigation and to undertake any remedial action, in accordance with any applicable laws and regulations.
- 6.2 The Company reserves the right to refer any concerns or complaints to appropriate external regulatory authorities. Depending on the nature of the complaint, the subject of the complaint may be informed of the allegations against him/her and be provided with an opportunity to defend himself/herself against such allegations. Employees who fail to

cooperate in an investigation, or deliberately provide false information during an investigation, shall be subject to strict disciplinary action up to, and including, immediate dismissal.

- 6.3 If at the conclusion of an investigation, The Company determines that a violation has occurred or the allegations are substantiated, remedial action commensurate with the severity of the offence will be taken.

7. REVIEW OF THE POLICY

- 7.1 The Company reserves the right to amend the Policy from time to time to maintain compliance with applicable laws and regulations or accommodate organisational changes within the Company.
- 7.2 The Audit Committee is responsible for monitoring and reviewing this Policy at least once every three (3) years. The Whistleblowing Policy shall also be made publicly accessible on the Company's website.

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