PENSONIC HOLDINGS BERHAD (300426-P)
Whistleblowing Policy

1. Introduction

This Whistleblowing Policy and Procedure ("Policy") seeks to enhance corporate governance by helping to foster an environment where integrity and ethical behavior is maintained and any illegality, improper conduct and/or wrongdoings in the Group may be exposed.

This Policy applies to **Pensonic Holdings Berhad ("the Company") and all of its subsidiaries.** For the purposes of this Policy, the Company together with its subsidiaries, are collectively referred to as ("**the Group**"). This is to ensure a consistent and unified approach to whistleblowing across all entities.

2. Objectives

This policy aims to provide the employees and stakeholders, acting in good faith, a formal, confidential and secured channel in reporting / disclosing any misconduct, non-integrity or unethical behavior in the business affairs.

3. Ownership & Scope

Chairman & Group Managing Director

The Chairman of Pensonic Holdings Bhd has the overall responsibility of this Policy and shall oversee the implementation of this Policy.

The Chairman has delegated day to day responsibility for the administration and implementation of the Policy to the Group Managing Director. The use and effectiveness of this Policy shall be regularly monitored and reviewed by the Group Managing Director.

In Scope: Employees, & Stakeholders

This Policy is applicable to all employees and stakeholders and covers all reports/disclosures against any employee and/or stakeholder that has committed an improper conduct against the interest of the Group.

Not in Scope: Employees' Grievances

This Policy does not apply to employees seeking to lodge any Employee Grievances or appeal in relation to any disciplinary actions and/or management decision that affect their own individual working conditions, environment or personal interest. Employees may submit such grievance complaints separately to the Human Resources department of the Group.

4. Definition

4.1	Chairman	- The Chairman of the Board of Directors of Pensonic Holdings Berhad.
4.2	Company	- Pensonic Holdings Berhad
4.3	Confidential Information	- Any information that is by its nature confidential or sensitive and / or not generally available to the public and in this Policy includes: - • Information about the identity, rank, position or other personal details of the whistle-blower. • A person against whom a Whistle-Blower has made a disclosure; or • Information disclosed by a Whistle-Blower; or • Information that, if disclosed, may cause detriment to any person
4.4	Group	- Pensonic Holdings Berhad and its subsidiaries
4.5	GMD	- Group Managing Director
4.6	Policy	- Whistleblowing Policy and Procedures for Pensonic Holdings Berhad.
4.7	Whistle-Blower	- Person that makes a report of Improper Conduct under this Policy
4.8	Employees	- All levels including the board of directors, executive officers, members of the management, permanent employees, contracted employees having employment relationships with our Group, as well as temporary workers and any seconded employees working under the control, supervision and payroll of the Group.
4.9	Employee Grievances	- Applicable to personal dissatisfaction or complaints by employees on matters related to their working conditions, environment and any other matters or personal interest. (This is not in the scope of this Policy).
4.10	Stakeholder	- These categories cover suppliers, contractors, agents, consultants, distributors, customers and any such other business partners who have direct or indirect business dealings with the Group.

5. Policy

5.1 Employees and stakeholders should make a disclosure at the earliest possible opportunity if it relates to any of the following wrongdoings by any person in the conduct of the Group's business or affairs:

- Acceptance of favor
- Corruption or fraud
- Criminal offence
- Misuse of the Groups' funds or assets
- Gross mismanagement within the Group
- Serious financial irregularity or impropriety within the Group
- Serious breach of the Groups' Code of Conduct / Ethics

- Actions or omissions that creates a significant risk to or endanger the lives, health or safety of the Group's stakeholders including its employees, the public or the environment.
- Non-Compliance with the provisions of other laws and regulations where the wrongdoer either intentionally disregards such provisions or fails to comply therewith
- Breach of Customer confidentiality or privacy
- Conflict of Interest
- Unauthorized use of confidential information
- Intentionally directing or advising or abetting a person or a group of persons to commit any of the above wrongdoings
- Withholding or cover up on any of the above

5.2 Whistle-blowing

A Whistle-Blower, in good faith may come forward with any information or documents if there are reasonable grounds to believe that a wrongdoing is occurring or has been committed.

5.3 Required Evidence

A Whistle-Blower should provide the disclosures in writing, including information related to type of activities or conduct and identify the person(s) suspected to be involved, the date/time of occurrence and the individuals or parties affected.

A Whistle-Blower is required to have first-hand knowledge or information of the facts. Information obtained from any third party or "hearsay" will not be entertained.

A Whistle-Blower should not be discouraged from making a report due to the fact they are not sure if the evidence on hand is sufficient.

5.4 Protection to a Whistle-Blower

A Whistle-Blower will be accorded with protection against being dismissed or penalised by the Group, provided that the disclosure is made in good faith. Such protection is accorded even if the investigation later reveals that the Whistle-Blower is mistaken as to the facts and the rules and procedures involved.

The Group gives the assurance that it will not reveal the identity of the Whistle Blower to any third party not involved in the investigation or prosecution of the matter. The only exception to this assurance relates to an overriding legal obligation to breach confidentiality. The Group is obligated to reveal confidential information relating to a whistle-blowing report, if ordered to do so by a court of law.

The protection afforded to a Whistle-Blower may be revoked under the following circumstances among others: -

- the Whistle-Blower participated in the improper conduct;
- the Whistle-Blower willfully discloses a false statement;
- the disclosure is made with malicious intent; or
- the disclosure is frivolous or vexatious.

6. Procedures

Any disclosures related to the abovementioned policies shall be made in accordance with **Section 5.4 (Protection to the Whistle-Blower)** and the procedures below.

6.1 Reporting Channels

Disclosures may be made **verbally or in writing** through either of the following confidential channels:

(a) By post, in a sealed envelope marked *"Strictly Confidential – To be opened by Addressee only"*, addressed to:

Chairman of the Audit Committee
Pensonic Holdings Berhad
1165 Lorong Perindustrian Bukit Minyak 16
Taman Perindustrian Bukit Minyak
14100 Simpang Ampat, Penang, Malaysia

(b) By email to the dedicated whistleblowing channel:

whistleblow@pensonic.com

This mailbox is accessible **only by the Chairman of the Audit Committee** to maintain independence and confidentiality.

If the disclosure concerns the Audit Committee or any of its members, it may instead be directed to the **Chairman of the Board**.

Reports may also be submitted using the **Whistleblowing Reporting Form** (refer to *Appendix 1*) and sent via the above email or postal address.

All disclosures will be handled in accordance with the confidentiality and protection provisions outlined in **Section 5.4** of this Policy.

6.2 Anonymous Reporting

Whistle-Blowers may choose to remain anonymous. However, providing contact information is encouraged to allow the Committee to obtain clarification and communicate updates where necessary.

Report lodged anonymously may be viewed with less credibility but will nevertheless, be considered, taking into consideration the following factors: -

a. The seriousness of the issues raised in the report
b. The credibility of the report
c. The likelihood of confirming the allegation from other sources

6.3 Acknowledgement and Review

Upon receipt of a disclosure, the Chairman of the Audit Committee shall **acknowledge receipt within seven (7) working days** and shall convene a **Whistle-Blower Committee ("WBC")** meeting as soon as practicable once sufficient information and evidence have been gathered.

6.4 Whistle-Blower Committee ("WBC")

The WBC shall comprise the following members:

- Chairman
- Audit Committee Chairman and Members

The WBC shall have authority to:

- Assess the legitimacy and credibility of the disclosure;
- Direct further action as deemed appropriate; and
- Determine who shall conduct the investigation (e.g. Compliance Department, Management, or external expert).

If any WBC member is named or implicated in the report, he or she shall abstain from participating in the deliberation and decision-making process.

6.5 Investigation Process

The appointed investigator shall ensure that the investigation is conducted **promptly, fairly, and impartially**.

All evidence, interview notes, and relevant documentation shall be properly recorded and kept securely by the Compliance Department.

6.6 Confidentiality and Whistle-Blower Protection

All disclosures and related investigation records will be treated with the **strictest confidentiality**.
Whistle-Blowers acting in **good faith** are protected from retaliation, victimisation, or disciplinary action in accordance with **Section 5.4 (Protection to the Whistle-Blower)**. Any person found to have made a report **maliciously or in bad faith** may be subject to disciplinary measures.

6.7 Outcome and Escalation

Upon completion of the investigation, the WBC shall present its findings and recommendations to the **Audit Committee and the Board of Directors** for further action. Where appropriate, the Whistle-Blower will be informed of the outcome of the case.

6.8 Record Retention and Data Protection

All whistleblowing reports, evidence, and investigation records shall be securely retained by the Compliance Department for a minimum of **seven (7) years**, in compliance with the **Personal Data Protection Act 2010** and the Group's record-management policy.

7. Reporting & Action Subsequent to the Report

Upon conclusion of the investigation, the Head of Compliance Department (or other assigned investigator) will present the outcome of the investigation to the WBC.

If the WCB is satisfied with the outcome of the investigation, it will communicate to management to proceed with action based on established policies and procedures for the necessary disciplinary action to be taken immediately.

Instituting the disciplinary action will be the responsibility of Human Resources Department. In cases involving members of the Board, it will be deliberated by the Board of Directors of Pensonic Holdings Berhad.

Management shall also take into account recommendations contain in the investigation report to prevent the conduct from continuing or occurring in the future. Appropriate actions may additionally be taken to remedy any harm or loss arising from the conduct.

8. Periodic Review and Disclosure

The Board of Directors may unilaterally amend and/or modify this Policy at any time and from time to time without prior notice. Amendments and modification may be necessary, among other reasons, to ensure compliance with laws and regulation and / or to accommodate organizational changes within the Group. However, any amendments and modification made shall only take effect after the same has been circulated to employees in writing or electronically.

This policy was approved by the Board of Directors of Pensonic Holdings Berhad on 18 November 2025

Appendix 1 – Whistleblowing Reporting Form

Section	Details
1. Reporter's Information *(leave blank if anonymous)*	
Name:	
Contact No:	
Email Address:	
Department / Relationship with the Group:	
2. Type of Concern	☐ Corruption / Fraud ☐ Misconduct ☐ Misuse of Assets ☐ Violation of Law or Policy ☐ Conflict of Interest ☐ Others (please specify): _____
3. Person(s) Involved	Name: Designation / Department:
4. Details of the Incident	Date / Time: Location: Description of misconduct / event (please provide as much detail as possible):
5. Evidence / Supporting Information	(Attach documents, photos, emails, or describe evidence if available)
6. Has this matter been reported elsewhere?	☐ Yes ☐ No If yes, please specify when, to whom, and the outcome:
7. Declaration	I declare that the information provided above is made in good faith and to the best of my knowledge is true and accurate.
Signature:	
Date:	