



QL Resources Berhad
Registration No. 199701013419 (428915-X)
Whistleblower Policy

WHISTLEBLOWER POLICY

QL Resources Berhad and its subsidiaries



TABLE OF CONTENTS	PAGE
1. INTRODUCTION	1
2. OBJECTIVES OF POLICY	1
3. MONITORING AND REVIEW	1
4. REPORTING PROCEDURES	2
4.1 Who can Disclose	2
4.2 What to Disclose	2
4.3 When to Disclose	3
4.4 How to Proceed	3
5. REPORTING CHANNELS	4
6. OVERSIGHT OF HANDLING OF DISCLOSURE	6
7. BEING INFORMED AND HAVING THE OPPORTUNITY TO BE HEARD	7
8. HANDLING/DISCUSSION OF AN INVESTIGATION	7
9. CONSEQUENCES OF WRONGDOING OR WRONGFUL DISCLOSURE	8
10. PROTECTION UNDER THIS POLICY	8
11. CONTACT INFORMATION	9
12. RECORD KEEPING	9
13. POLICY REVIEW	9
 APPENDICES	
APPENDIX I Whistleblowing Report Form	10
APPENDIX II Illustrative Reporting and Escalation Diagram	11



1. INTRODUCTION

Whistleblowing is a form of disclosure. It involves a Person, i.e. the Whistleblower, raising serious concerns about risks of wrongful activities or reporting a wrongdoing. QL Resources Berhad (“QL” or the “Company”) and its subsidiaries (the “Group” or “QL Group”) are committed to the values of transparency, integrity, impartiality, and accountability in the conduct of its business and affairs.

QL Group expects actual and potential wrongdoings, such as, but not limited to, fraud, corruption, serious financial impropriety, gross mismanagement and violations to the human rights and labour standards policy (“Wrongdoings”) to be reported, and it facilitates this through internal mechanisms as well as this Whistleblowing Policy (this “Policy”) and its mechanism.

This Policy provides an alternative route for Persons to raise concerns if the usual lines of communication are not available. Nothing in this Policy shall interfere with other established operational policies and processes.

For the purpose of this Policy, “Person” includes any person described in the “Who Can Disclose” section on the following page.

2. OBJECTIVES OF POLICY

The purpose and objectives of this Policy are:

- to facilitate the making of a disclosure relating to a Wrongdoing (“Disclosure”) as early as possible and in a responsible manner;
- to address a Disclosure in an appropriate and timely manner. When disclosure matters are addressed, they may be prioritised according to the nature or gravity of the alleged Wrongdoings or reported risk(s) and the magnitude of the repercussions;
- to protect a Whistleblower from reprisal as a direct consequence of making a Disclosure and to safeguard the Whistleblower; and
- to treat both the Whistleblower and alleged wrongdoer fairly.

3. MONITORING AND REVIEW

In general, all Disclosures pursuant to this Policy are to be made to the Prescribed Person(s) who are Management personnel of QL.

The Prescribed Persons are responsible for ensuring compliance with this Policy and shall prepare a report consisting of the allegations in the Disclosure and investigation, which include the following information:

- number of complaints;
- types of complaints;
- nature of process or resolution; and
- whether the allegation was founded or not.



This report will be used for statistical and oversight purposes only and presented to the Board of Directors of QL, via the Risk Management Committee, on a quarterly basis.

4. REPORTING PROCEDURES

This Policy is intended to complement the normal channels of communication and reporting lines within QL Group. Persons shall first consult or raise their concerns with their immediate superiors or heads or, where appropriate, the Group Chief Executive Officer. However, if their complaints or concerns remain unresolved, this Policy provides a formal mechanism for such Persons to escalate to higher authorities within the Group.

4.1 Who can Disclose

Any of the following Persons can make a Disclosure:

- QL Group's employees, including employees on contract terms, temporary or short-term employees, and employees on secondment, where applicable;
- individuals performing services for QL Group, including contractors and service providers;
- persons who have business dealings with the Group; and
- members of the public.

4.2 What to Disclose

A Disclosure may be made if it relates to a Wrongdoing by any person in the conduct of QL Group's businesses or affairs, including, but not limited to, the following:

- acceptance of illegal or questionable favour;
- corruption or fraud;
- criminal offence;
- misuse of QL Group's funds or assets;
- gross mismanagement within QL Group;
- serious financial irregularity or impropriety within QL Group;
- conflict of interest that has not been disclosed previously;
- serious breach of QL Group's Code of Business Ethics and Conduct (Directors and Employees) or Code of Business Ethics (Suppliers and Business Associates);
- an act or omission which creates a substantial or specific danger to the lives, health, or safety of QL Group's employees, the public, or the environment;
- failure to comply with the provisions of the laws where the wrongdoer knowingly disregards or does not comply with such provisions;
- knowingly directing or advising a person to commit any of the above Wrongdoings; and
- business-related human rights abuse, labour standards infringement and any violations to the Human Rights and Labour Standards Policy.



This Policy **EXCLUDES** grievances, complaints, or concerns about:

- general complaints regarding QL Group's products and services;
- matters which are trivial or frivolous or malicious or vexatious in nature or solely motivated by personal agenda or will;
- matters pending or determined through QL Group's disciplinary proceedings; and
- matters pending or determined through any tribunal or authority or court, arbitration or other similar proceedings.

A Wrongdoing may occur in the course of QL Group's businesses or affairs or at a workplace related to QL Group's businesses or affairs, for example, on QL Group's premises, at an event organised by QL Group, or during a conference attended by QL Group's employees in the course of his/her work.

If a Person is unsure whether a particular act or omission constitutes a Wrongdoing under this Policy, he/she is encouraged to seek advice or guidance from his/her immediate superior or head or his/her liaison within the Group or, when necessary, the Group Chief Executive Officer.

4.3 When to Disclose

A Whistleblower should come forward with any information or document that he/she, in good faith, reasonably believes a Wrongdoing is likely to happen, is being committed, or has been committed.

The Whistleblower needs to demonstrate that he/she has reasonable grounds for the concerns. However, the Whistleblower is not expected to first obtain substantial evidence of proof beyond reasonable doubt when making a Disclosure. If he/she knows as a matter of fact that there are serious risks that a wrongdoing is going to take place, such genuine concerns should be raised at that early stage.

Disclosure should be made as early as practicable. Delaying the Disclosure may be detrimental to the Whistleblower and the Group as well as any investigation and makes it harder for the Group to address and resolve the concerns.

4.4 How to Proceed

Procedures for Disclosure

- (a) A Disclosure can be made in writing, orally, or via electronic mail ("email").
- (b) A Disclosure shall include at least the following particulars:
 - if the Whistleblower is an employee of QL Group, his/her name, designation, current address and contact numbers; or
 - if the Whistleblower is not an employee of QL Group, his/her name, current address and contact numbers;
 - basis or reasons for his/her concerns, including as many details as reasonably possible, in relation to the Wrongdoing, for instance, its nature, the date, time, and place of its occurrence, and the identity of the alleged wrongdoer;



- particulars of witnesses, if any; and
- particulars or production of documentary evidence, if any.

The Whistleblower may be asked to provide further clarifications and information from time to time, for example, if an investigation is conducted.

- (c) Whistleblowers are encouraged to use the Whistleblowing Report Form as provided in **APPENDIX I** of this Policy and provide as much relevant information as possible. Whistleblowers are also encouraged to disclose their identity to facilitate the investigation process. Whistleblowers should be aware that QL Group's ability to assess, investigate, and take appropriate action in respect of the reported wrongdoing may be limited to the information provided and may be impeded due to the lack of access to the Whistleblowers for more information.
- (d) Subject to practicability and the manner in which the Disclosure is made, the Whistleblower will be informed of the status of his/her Disclosure. The alleged wrongdoer will be informed of the allegations at an appropriate stage of the investigation and given an opportunity to respond to the allegations. The identities and personal information of the Whistleblower and the alleged wrongdoer shall be disclosed strictly on a "need-to-know" basis to persons involved in the investigation or related processes, in accordance with applicable laws.

5. REPORTING CHANNELS

(a) Reporting to a Prescribed Person

- i) Generally, all Disclosures pursuant to this Policy are to be made to a Prescribed Person except in the circumstances specified in **Paragraphs 5(b) or 5(c)** below.

The Prescribed Persons are currently the Executive Chairman or the Group Chief Executive Officer.

- ii) In relation to orally made Disclosures, the Prescribed Person shall commit to writing and documenting the Disclosure and the Whistleblower is to confirm the written statements. As far as reasonably practicable, such Disclosure shall be made in a private room within QL's premises.
- iii) The Prescribed Person will screen and assess the Disclosure to determine whether it is related to a Wrongdoing or not within the scope of this Policy, and shall, (a) in the case of Prescribed Person being the Group Chief Executive Officer, shall recommend the next course of action, referred to in **Paragraph 5(a)(iv)** below, to the Executive Chairman for determination, and (b) if the Prescribed Person is the Executive Chairman, determine the next course of action referred to Paragraph 5(a)(iv) below.

This initial process should be expedited if the wrongdoing is capable of causing irreparable harm to QL Group.



- iv) A response to a Disclosure includes, but not limited to, any of the following:
 - a. rejection of the Disclosure;
 - b. directing the concerns or any part thereof for consideration under other internal procedures or disciplinary procedures, if appropriate and applicable;
 - c. resolution without recourse to an investigation;
 - d. directing investigations of the Disclosure and any persons involved or implicated;
 - e. suspending the alleged wrongdoer or any other implicated persons from work to facilitate any fact-finding or to avoid any employee's exposure to a threat or harm;
 - f. designating any other persons from within or without QL Group to conduct any investigation or to carry out any other process pursuant to this Policy (for instance, any meeting or an internal audit);
 - g. obtaining any other assistance (for instance, external auditors or legal advice);
 - h. escalating the Disclosure to the Prescribed Independent Director or the Audit Committee Chairman; and/or
 - i. referral to the police or any other appropriate enforcement authority.
- v) The Executive Chairman shall have the authority to make any final decisions in relation to any Disclosures directed to a Prescribed Person.

(b) Reporting to a Prescribed Independent Director

- i) A Disclosure shall be made directly to the Prescribed Independent Director if the alleged wrongdoing involves any of the Prescribed Person(s) or a Director of the Company.
- ii) A Disclosure can be also made directly to the Prescribed Independent Director in any of the following circumstances:
 - where the wrongdoing does not involve the Prescribed Person(s) but the Whistleblower, in good faith, reasonably believes that there will be a cover-up or that the Prescribed Person(s) is personally conflicted (for instance, the Prescribed Person(s) is a close friend of the alleged wrongdoer);
 - where a Disclosure has been made to the Prescribed Person(s) in accordance with **Paragraph 5(a)(i)** above and the Whistleblower is, with reasonable grounds, dissatisfied with the outcome in relation to the Disclosure.

(c) Reporting to the Audit Committee Chairman

If the Whistleblower reasonably and in good faith believes that it will be inappropriate to disclose to the Prescribed Persons and the Prescribed Independent Director, the Disclosure can be made directly to the Audit Committee Chairman.



(d) Reporting procedures

- i) A Whistleblower who intends to make a Disclosure in accordance with **Paragraphs 5(b) or 5(c)** above may be guided by the following:
 - for a physically written (or printed) Disclosure, the Whistleblower may forward his/her Disclosure in a sealed envelope to the Prescribed Independent Director or the Audit Committee Chairman, in care of the Company Secretary. If the Whistleblower would like to discuss any matter with the Prescribed Independent Director or the Audit Committee Chairman, the Whistleblower should indicate this in the submission and include a telephone number at which he/she could be contacted if the Prescribed Independent Director or the Audit Committee Chairman deems it appropriate; or
 - the Whistleblower may contact the Prescribed Independent Director or the Audit Committee Chairman directly via the dedicated phone number or email as provided in the **Contact Information** section of this Policy.
- ii) in relation to a Disclosure made pursuant to **Paragraphs 5(b) or 5(c)** above, the Prescribed Independent Director or the Audit Committee Chairman, as the case may be, has the authority to decide on the next course of action as well as making the final decision, including, but not limited to, any of those mentioned in **Paragraph 5(a)(iv)** above.

The Prescribed Independent Director or the Audit Committee Chairman, as the case may be, may designate any persons, other than the Prescribed Persons, from within or without QL Group to conduct any investigation or to carry out any other process pursuant to this Policy (for instance, any meeting or an internal audit).
- iii) If the Disclosure involves the Prescribed Person(s) or a Director of the Company, pursuant to **Paragraphs 5(b) and 5(c)** above, the Prescribed Independent Director or the Audit Committee Chairman, as the case may be, shall then be responsible for the investigation and recommendation to the Audit Committee of QL (without the presence of the conflicted Directors), which has the authority to make final decisions.

6. OVERSIGHT OF HANDLING OF DISCLOSURE

The Risk Management Committee shall be updated on the progress and reviewing a summary of Disclosure(s) made pursuant to **Paragraph 5(a)(i)** above.

The Audit Committee shall be updated on the progress and handling of Disclosure(s) made pursuant to **Paragraphs 5(b) or 5(c)** above, without the presence of conflicted parties (i.e. any conflicted Directors and even the Prescribed Independent Director, if conflicted).

An overview diagram for reporting procedure is depicted in the diagram annexed as **APPENDIX II** of this Policy.



7. BEING INFORMED AND HAVING THE OPPORTUNITY TO BE HEARD

The Whistleblower will be informed of the status of his/her Disclosure as far as reasonably practicable. The Whistleblower and the alleged wrongdoer are expected to give their full cooperation in any investigation or any other process carried out pursuant to this Policy.

The investigation and related proceedings pursuant to this Policy shall be undertaken by personnel who are independent and objective from the function and personnel being involved in the alleged Wrongdoing.

The alleged wrongdoer may be asked to attend a meeting to discuss the allegations and must take all reasonable steps to attend the meeting. He/she will be given an opportunity to answer the allegations at the meeting, and his/her own answers will be recorded in the minutes of the meeting. The meeting may be adjourned for QL Group to obtain any advice or proceed with further investigations. A meeting may not necessarily be held within the early stages of an investigation.

In the event the Whistleblower is implicated or discovered to be or has been involved in any Wrongdoing, he/she may also be investigated so as to complete the fact-finding process. An investigation is not and shall not be treated as a reprisal against the Whistleblower. It is to facilitate decision making. The Whistleblower may then be asked to attend a meeting to discuss the allegations and must take all reasonable steps to attend that meeting. He/she will be given an opportunity to answer the allegations at that meeting, and his/her own answers will be recorded in the minutes of that meeting. That meeting may be adjourned for QL Group to obtain further advice or proceed with further investigations.

The Whistleblower, and if applicable, the alleged wrongdoer will be notified in writing of the decision on the Wrongdoing (e.g. whether the wrongdoing occurred or not; or whether the alleged wrongdoer is guilty or not), and the basis thereof.

8. HANDLING/ DISCUSSION OF AN INVESTIGATION

- (a) No information concerning the status of an investigation shall be given out. The proper response to any inquiry is: "*I am not at liberty to discuss this matter*".
- (b) Under no circumstances should any reference be made to "the crime," "the fraud," "the forgery," "the misappropriation," or any other specific reference.
- (c) The Whistleblower should be informed of the following:
 - i) do not contact the suspected individual in an effort to determine facts or demand restitution; and
 - ii) do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked to do so by the Prescribed Person, Prescribed Independent Director, and the Audit Committee Chairman.



9. CONSEQUENCES OF WRONGDOING OR WRONGFUL DISCLOSURE

If the Whistleblower has, or is found to have:

- committed a Wrongdoing;
- taken serious risks which would likely cause a Wrongdoing to be committed;
- made a Disclosure not in accordance with the requirements of this Policy (for instance, dishonest, mischievous, or malicious complaints); or
- participated or assisted in any process pursuant to this Policy otherwise than in good faith,

the corrective actions to be taken against that Whistleblower will be determined by the Group Chief Executive Officer or, if so delegated by the Group Chief Executive Officer, the Senior Management, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension, or termination of employment or services with QL Group or monetary or other forms of punishment.

10. PROTECTION UNDER THIS POLICY

Upon making a Disclosure in good faith, based on reasonable grounds and in accordance with the procedure pursuant to this Policy:

- the Whistleblower shall be protected from reprisal within QL Group as a direct consequence of his/her Disclosure; and
- the Whistleblower's identity shall be protected, i.e. kept confidential, unless otherwise required by law or for purposes of any proceedings by or against QL Group.

The identities and personal information of the Whistleblower and the alleged wrongdoer may be revealed to persons involved in investigations or any other processes on a "need-to-know" basis.

If the Whistleblower, in good faith, reasonably believes he/she is being subjected to harassment, victimization, or reprisal as a direct consequence of having made a Disclosure under this Policy, the Whistleblower may consult the relevant persons handling the whistleblowing report, i.e. the Prescribed Person(s), Prescribed Independent Director, or the Audit Committee Chairman, in confidence. Essentially, the complaint shall be processed in a similar manner as a whistleblowing Disclosure and is subject to similar requirements. The Group does not permit retaliation of any kind, by the Group or its personnel, against the Whistleblower for complaints submitted hereunder that are made in good faith. Any such reprisal shall in itself be considered a serious breach of this Policy.



11. CONTACT INFORMATION

Prescribed Person Dr. Chia Song Kun (Executive Chairman)

Phone : 03-7801 2288

Email : ecwhistleblowing@ql.com.my

Prescribed Person Mr. Chia Song Kooi (Group Chief Executive Officer)

Phone : 03-7801 2288

Email : gmdwhistleblowing@ql.com.my

Prescribed Independent Director Mr. Wee Beng Chuan

Phone : 012-2070 137

Email : idwhistleblowing@ql.com.my

Audit Committee Chairman Mr. Low Teng Lum

Phone : 012-3086 638

Email : accwhistleblowing@ql.com.my

12. RECORD KEEPING

The relevant parties handling the Disclosures shall retain relevant documentations for a period of not less than seven (7) years.

13. POLICY REVIEW

This Policy shall be reviewed by the Board of QL periodically and at least once in every three (3) years, to ensure its relevance and effectiveness in keeping with QL Group's changing business environment or administrative or operational needs.

This Policy was approved by the Board of QL on 27 November 2025.



APPENDIX I

WHISTLEBLOWING REPORT FORM

Please fill out this form and submit it to the Contact Information as described under Paragraph 11 of this Policy. All information provided will be kept confidential, and you may choose to remain anonymous.

Particulars of Whistleblower			
Do you wish to remain anonymous?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Name:			
NRIC No.:		Employee ID (if applicable):	
Contact No.:		Email:	

Particulars of Disclosure	
Date of Disclosure:	
Company and location:	
Nature of Disclosure (Please include (a) background and any relevant history on the Disclosure, (b) name of persons involved, (c) time and date of any subsequent actions or communications, (d) particulars of what happened or what was carried out (e) documents and photographic evidence of any such incidences):	
Witness (please provide contact of the witness such as name, contact number etc, if any, and/or the best way to get in touch with him/her):	

I confirm that the information reported above are true and accurate to the best of my knowledge and all relevant evidence, further information and documents have been attached to this report. I acknowledge that I may be required to testify as a witness and support in any further investigation processes on these allegations.

Signature

Date:



APPENDIX II

ILLUSTRATIVE REPORTING AND ESCALATION DIAGRAM

