



ELRIDGE ENERGY HOLDINGS BERHAD
[Registration No. 202401001446 (1547297-X)]
(Incorporated in Malaysia)

WHISTLE BLOWING POLICY
(Adopted w.e.f. 19 March 2024)

1.0 Introduction

Elridge Energy Holdings Berhad (“**Elridge Energy**” or “**the Company**”) and its subsidiary (“**Group**”) expect the highest level of professionalism and ethics among its employees. The Whistle Blowing Policy (“**the Policy**”) aims to provide all employees and third parties the avenue to disclose any information relating to wrongdoings, malpractices, and any irregularities discovered in good faith. This Policy also addresses the rights and protection for individuals disclosing such information, to protect them from possible reprisals or victimization resulting from the disclosure of concerns done in good faith. All Directors and Employees of the Group shall comply with this Policy.

2.0 Scope of Policy

This Policy applies to all Employees and stakeholders including the general public, who has become aware of or genuinely suspects on a reasonable belief that a person associated with the Group, including a Director, Employee, and a third party who has a business relationship with the Group, has engaged, is engaged or is preparing to engage in any improper conduct or wrongdoing.

This Policy shall exclude any issues, complaints or concerns regarding the following:-

- i) matters pending determination or which have been determined through any tribunal or authority or court, arbitration or similar proceedings; or
- ii) disclosure specifically prohibited by any written law.

A person who has made a report via this Policy is hereinafter referred to as a “**Whistleblower**”.

The scope of this Policy covers complaints relating to (non-exhaustive):-

- a) unlawful acts that breach criminal or civil law (including sexual harassment);
- b) bullying;
- c) breach of policies and procedures (including sharing of proprietary information of the Company and the Group with third parties);
- d) abuse of power;
- e) financial malpractices;
- f) impropriety and fraud;
- g) corruption, bribery, and blackmail;
- h) acceptance gifts or favor beyond the threshold allowed by the Company;
- i) misuse or misappropriation of the Company’s funds or assets;
- j) criminal offences;
- k) criminal breach of trust;
- l) actions capable of causing physical harm to another individual;
- m) actions that can give rise to the risk of damage to assets belonging to the Company;
- n) negligence in carrying out work obligations;
- o) conflict of interest without disclosure;
- p) insider trading;
- q) academic or professional malpractice;

- r) environmental damage;
- s) deficiencies in or non-compliance with the Group's internal controls, policies and procedures;
- t) falsification or destruction of financial records;
- u) misrepresentation of financial information;
- v) misuse of position and/or information; and
- w) concealment of any of the above.

It is important to note that when determining impropriety conduct, it is not only measured in terms of monetary value lost, or damage to a particular business, but it may also be adversely affected to the integrity and reputation of the Company itself.

Whenever possible, any concerns should be raised and dealt with through the normal reporting lines and procedures in the Company. However, where it is believed that the concern cannot be resolved through normal reporting lines and procedures, or implicates senior levels of management within the Company, or the Employee's employment or even safety or security may be jeopardised by raising the concern, then the concern can be raised through the channel provided in this Policy.

3.0 General Principles

The general principles of this Policy are as follows:

- a) All concerns or complaints will be treated fairly and without prejudice.
- b) All information, including the identity of the whistleblower shall be treated as confidential and would only be shared on a need-to-know basis and only with the consent of the whistleblower.
- c) The board of directors of the Company ("**Board**") is committed to protecting whistle-blowers from acts of harassment and victimization arising from whistleblowing disclosures.
- d) The Board will ensure no whistle-blower will be at risk of suffering some form of reprisal as a result of disclosing information in good faith, even if he is mistaken. The Board, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue or is acting for personal gain.
- e) The Board views very seriously any false and malicious allegations. In some cases, this might be considered as gross misconduct and disciplinary actions may be taken. The submission of such false allegations would also make the whistleblower liable for damages to the company and/or anyone implicated.
- f) The act of whistleblowing does not protect the whistle-blower from the reasonable consequences of any involvement in improper conduct.

4.0 Procedures

The whistle-blower should come forth immediately in good faith, with any information if he/she believes that improper conduct was committed, is being committed, or will be committed.

Through his/her immediate superior or management of the Company in writing, the whistle-blower should provide the following:

- 1) full name and contact details;
- 2) background, date, history, and description of the misconduct;
- 3) identity of the suspected wrongdoer;
- 4) reasons for the concern;
- 5) details of witnesses and all factual supporting evidence;
- 6) whether the whistle-blower has any personal interest in the matter;
- 7) details on any actions already taken by anyone else; and
- 8) any other information which could facilitate investigation.

Should the superior not be able to address the complaint, the superior should escalate the concern with all relevant information to higher management and inform the whistle blower accordingly. This is to be done with the strictest confidentiality.

The management who receives the complaint shall maintain all complaints received, tracking their receipt, investigation, and resolution. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.

4.1 The management may decide not to investigate the complaint for the following reasons:-

- a) the complaint is trivial;
- b) the complaint is frivolous or vexatious;
- c) the whistle-blower has had knowledge of the disclosed matter for over 12 months, and fails to provide a satisfactory reasoning for the delay in making the disclosure; and
- d) the whistle-blower has personal interest in the matter.

4.2 If the management deems that the complaint warrants an investigation, the management will conduct the investigation with complete independence and confidentiality in the shortest possible time given the resources available.

4.3 The investigation shall be conducted based on the following guiding principles:

- a) Confidentiality of information of complaint and identity of whistle-blower is to be safeguarded.
- b) The complaint shall be addressed promptly.
- c) The investigation is performed fairly, and all evidence are assessed, that either substantiate or refutes the complaint.
- d) The investigation is conducted in an unbiased manner, and no conclusions are drawn prior to reviewing all available evidence.

- e) Individuals suspected of misconduct should be informed of the matter as soon as practicable, and given the opportunity to provide explanations, details, evidence, and responses against allegations.
- 4.4 The whistle-blower will be informed of who is handling the matter and is allowed to make contact with the investigator and can provide further information to facilitate the investigation. The whistle-blower will be updated on the progress of the investigation unless such information is detrimental to him/her or the investigation process, or any other reasonable reasons.
 - 4.5 The whistle-blower may lodge a report to the Audit and Risk Management Committee (“**ARMC**”) directly should the above channels have been followed and the whistle-blower still has concerns, or that there were no actions taken by superior or management and all alternatives for internal consultations have been exhausted.
 - 4.6 The lodgment of the report to the ARMC can also be made if the procedures above is not appropriate in view of the circumstances or nature of the incidents (for instance, if there is a conflict of interest or a risk of reprisals, the intended recipient of the complaint is personally implicated in the incidents to be reported).
 - 4.7 The ARMC may appoint independent officers (internal or external) at the expense of the Company to investigate and report to the ARMC the following:-
 - 1. the allegation;
 - 2. documents, statements, evidence received, conclusions, and basis for the conclusions are made;
 - 3. recommendations based on the investigation; and
 - 4. measures that need to be taken by the Company to prevent future occurrences of misconduct.
 - 4.8 In cases relating to criminal activity, the cases may be referred to the police at any stage of the investigation. In such circumstances, external parties shall investigate the case.
 - 4.9 Directors and employees are to fully cooperate with any investigations initiated under this Policy.
 - 4.10 Directors and employees must always refrain from any activities which constitute victimizing or harassing of whistle-blower making a complaint in good faith. Any victimization, harassment or reprisal against the whistle-blower will be reported immediately to the ARMC, in which appropriate discipline action shall be taken.
 - 4.11 Upon completion of an investigation, all documentation pertaining to the complaint including but not restricted to the investigation report, corrective action taken and evidence shall be maintained by the Human Resource Department.

5.0 Reporting and Retention of complaints and investigations

The ARMC Chairman will maintain a log of all Complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary thereof for the ARMC members, as and when needed, taking into consideration the protection of confidentiality, especially of the identities of the whistle-blowers. Copies of Complaints and such log will be maintained in accordance with the Group's document retention policy.

6.0 Review of this Policy

The Board shall review and assess the relevance and effectiveness of this Policy periodically to assess their effectiveness, and in any event, at least once every three (3) years pursuant to the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad, the Board deem necessary and/or require to ensure its relevance and effectiveness in keeping with the Group's changing business environment, administrative or operational needs as well as changes to legislations.