WHISTLEBLOWING POLICY AND GUIDELINES

DAYANG ENTERPRISE HOLDINGS BHD

REGISTRATION NO. 200501030106 (712243-U)

Revised on
21st August 2025

1. INTRODUCTION

Dayang Enterprise Holdings Bhd, and its subsidiaries (excluding Perdana Petroleum Berhad, which is also a public company listed on the Main Market of Bursa Malaysia Securities Berhad) (herein referred to as the "Group") is committed to promote and maintain high standards of integrity, openness and accountability in the conduct of its businesses and operations. An accountable and transparent workplace provides a mechanism for employees to voice genuine concerns in an appropriate and confidential manner.

2. OBJECTIVE

The objective of this Whistleblowing Policy and Guidelines is to provide an avenue for all employees of the Group and stakeholders (i.e. suppliers, customers, shareholders or members of the public) (collectively referred to as "Whistleblowers"): -

a) To communicate and disclose any Improper Conduct within the Group to the appropriate party within the Group in accordance with this Whistleblowing Policy and Guidelines;

b) To clarify the protection accorded to Whistleblowers who report allegations of any Improper Conduct; and

c) To ensure disclosure of Improper Conduct is managed in an appropriate and timely manner.

3. SCOPE

This Policy applies to all employees and members of the public. Improper Conduct is any conduct which, if proved, constitutes a disciplinary action or a criminal offence. These include, but are not limited to:

i) Criminal offences including unlawful acts, fraud, corruption, bribery or blackmail;
ii) Failure to comply with provisions of laws or regulations;
iii) Misuse of the Group's funds or assets, theft or embezzlement or gross mismanagement;
iv) An act or omission which creates a substantial and specific danger to the lives, health or safety of the employees or the public or the environment;
v) Serious breach of Group's General Code of Conduct and Discipline;
vi) Serious financial irregularity or impropriety within the Group;
vii) Abuse of power by an officer of the Group;
viii) Deliberate concealment of information (including intentional omission, attempt to cover-up, or providing false and misleading information, and to commit any of the above Improper Conduct); and
ix) Any misconduct as stated in any of the Group's established policies and manuals.

The list of Improper Conduct under this section is not exhaustive and shall include any other act or omission, which if proven, will constitute an act of misconduct pursuant to the Code of Business Ethics and/ or a criminal offence under the relevant law in force.

4. REPORTING PROCESS AND PROCEDURES

4.1 Procedures for Raising a Complaint

4.1.1 When an individual believes that a specific concern falls within the scope of this Whistleblowing Policy and Guidelines cannot be solved through the Group's existing internal written procedures/control systems, he/or she can choose to make a disclosure on any Improper Conduct that concerns the Group in writing, to the Prescribed Officer, the officer designated by the Executive Deputy Chairman and/or Managing Director from time to time. At this juncture, the Chairman of the Audit Committee shall be the Prescribed Officer. The disclosure should be addressed to the following:

To: Professor Dr Ho Poh Ling
Chairman of Audit Committee
c/o: Dayang Enterprise Holdings Bhd Sublot 5-10, Lot 46, Block 10,
Jalan Taman Raja, MCLD, 98000 Miri, Sarawak.
Email Address: paulineho777@gmail.com

4.1.2 The Prescribed Officer shall inform the Whistleblower of the decision made and actions taken or to be taken within (10) working days of receiving his/her report.

4.1.3 The whistleblowing reporting structure is provided in **Appendix B.**

4.1.4 Whistleblowers are advised to provide sufficient details which include the following: -

i. a description of the Improper Conduct and involved parties;

ii. a background of the incident, including the relevant dates and location of occurrence;

iii. how the Improper Conduct was discovered;

iv. reason(s) of concern (e.g., potential loss of the Group's assets/funds); and

v. Supporting evidence and witness, if any.

4.1.5 Whistleblowers may also use the attached form as in **Appendix A** when making the disclosure.

4.1.6 Whistleblower are encouraged to provide their identities when submitting a complaint/ /disclosure, including name, contact details, and department/ Group name in order to obtain clarity and further information on the investigation under paragraph 4.2 and 4.3. Anonymous whistleblowing is permitted but may limit to the investigation.

4.1.7 Although the Whistleblower is not expected to prove beyond reasonable doubt the truth of the disclosure, the whistleblower shall need to demonstrate that there are reasonable grounds for his/ her concern and provide sufficient information for the Group to take appropriate steps.

4.1.8 The Whistleblower shall not attempt to personally conduct any investigation, interview or interrogation related to the matter being disclosed.

4.2 Screening

4.2.1 The Human Resource and Administration Department will screen and assess the Whistleblower's disclosure to determine whether it is related to wrongful activities or wrongdoings specified in paragraph or excluded from the scope of the Whistleblowing Policy and Guidelines.

4.2.2 Initial enquiries will be made via telephone communication or emails with the whistleblower to decide on how to deal with any concerns raised and determine whether further interview is required, and the form that it should take. Some concerns may be resolved without the need of an interview process. If the allegation is on an Employee, he/she shall automatically be recused and excluded from participating in the investigation and decision-making process pertaining to the allegation.

4.2.3 If an interview is required, the Prescribed Officer will meet with the Whistleblower to obtain further information, clarification and documents which may be resolved without the need of an interview process.

4.2.4 If the Whistleblower's disclosure implicates the Prescribed Officer, he/she can direct write to the Executive Deputy Chairman and/or Managing Director of the Group (herein referred to as the "Board"), the Board will prepare a report that includes general recommendations for the Board consideration.

4.3 Preliminary Action

4.3.1 The Prescribed Officer will make decisions, but not limited to any of the following:

a. Rejection of the Whistleblower's disclosure;

b. Directing investigation by the internal expertise, the Prescribed Officer or any subject matter experts;

c. Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the Group's General Code of Conduct and Discipline to facilitate any fact-finding or to avoid any Whistleblowers' exposure to a threat or harm;

d. Referral to the police or any other appropriate enforcement authority;

e. Referral to the Board for decision.

All decisions made by the Prescribed Officer and the reasons of action thereof shall be properly documented.

4.3.2 If the case is referred to the Board for decision, the Board will make decisions including but not limited to any of the following:

a. Directing investigation by the internal expertise;

b. Suspending the alleged wrongdoer or any other implicated persons from work in accordance with the Group's General Code of Conduct and Discipline to facilitate any fact-finding or to avoid any Whistleblowers' exposure to a threat or harm;

c. Referral to the police or any other appropriate enforcement authority;

All decisions made by the Board and reasons of action thereof shall be minuted in the minutes of meetings o the Board.

4.3.3 Subject to legal constraints, the Whistleblower will be notified of the status of his/her whistleblower's disclosure based on the preliminary action taken by the Prescribed Officer or the Board as far as reasonably practicable, in good time.

The status will be updated by the Prescribed Officer to the Whistleblower upon approval from the Board.

4.4 Conducting Investigation

4.4.1 The investigation would be carried out under the terms of strict confidentiality, by not informing the subject of the Whistleblower's disclosure complaint until (or if) it becomes necessary to do so.

4.4.2 The Whistleblower and the alleged wrongdoer are expected to give his or her full cooperation in any investigation or any other process carried out pursuant to this Whistleblowing Policy and Guidelines and/ or disciplinary action in accordance with Group's General Code of Conduct and Discipline. The amount of contact between the Whistleblower, the alleged wrongdoer and the investigating party will depend on the nature of the issue and the clarity of the information provided. Further information may be sought from or provided to the Whistleblower and the alleged wrongdoer.

4.4.3 The investigation will be carried out internally and/or by external party, with the directive of the investigation could be from the Board.

4.4.4 As far as possible, all the investigation will be completed within thirty (30) working days. However, a complex investigation that requires a longer period will be notified to the Board.

4.4.5 In the event the Whistleblower is implicated or discovered to be or have been involved in any wrongful activities or wrongdoing, he or she may also be investigated so as to complete the fact-finding process in accordance with this Whistleblowing Policy and Guidelines and/or the Group's General Code of Conduct and Discipline.

4.4.6 if the alleged wrongdoer or any other implicated persons has/have, or is/are found to have:

- Committed a wrongdoing; or

- Taken serious risks which would likely cause a wrongdoing to be committed

based on the investigation directed by the Prescribed Officer/Borad, the action to be taken against that alleged wrongdoer or any other implicated persons will be subjected to Disciplinary Action in accordance with the Group's General Code of Conduct and Discipline, which may include formal warning or reprimand, demotion, suspension or termination of employment or services with the Group.

4.4.7 The Board, with the recommendation from the Prescribed Officer, will have the final decision on the appropriate measures to be taken including, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons. The Board will seek guidance from legal expert or the Chairman of the Group Board when considered necessary.

4.4.8 In circumstances where immediate decision is required, the Board, with the recommendation of the Prescribed Officer will make the decision on the appropriate measures to be taken, on whether to pursue any legal actions against alleged wrongdoer or any other implicated persons. The report will be presented subsequently to the Board for approval and final decision.

4.4.9 In the event the implicated personnel is the Board member(s), the Board based on the investigation report, will have the final decision on the appropriate measure to be taken including, on whether to pursue and legal actions against alleged wrongdoer or any other implicated persons.

4.4.10 All decisions made by the Board and reasons of action thereof shall be minuted in the minutes of the Board meetings.

4.5 Reporting Outcome

4.5.1 The Prescribed Officer or any of the Board members shall notify the Whistleblower on the outcome of the disclosure.

4.5.2 All records of disclosures, statements, evidence and findings shall be managed in compliance with the provisions of the Personal Data Protection Act 2010 and other applicable laws.

4.5.3 All the above preliminary and/ or detailed investigation processes shall be properly reported and documented.

5. PROTECTION OF THE WHISTLEBLOWER

5.1 A Whistleblower who is an Employee will be protected from reprisal, provided that the disclosure is made in good faith and subject to conditions fulfilled as in paragraph 5.3. Such Protection is accorded even if the investigation later reveals that the whistleblower is mistaken as to the facts and/or the rules and procedures involved.

5.2 The stakeholders (i.e. suppliers, customers, shareholders or members of the public) who become a Whistleblower will also be protected by the Group as to his / her identity subject to the conditions described in paragraph 5.3.

5.3 Protection to the Whistleblower will be accorded by the Group only when all the following conditions are met:

i. The disclosure is done in good faith, is not frivolous or vexatious or is not made with malicious intent or ulterior motive;

ii. The whistleblower has not communicated the disclosure to any other party not related to the disclosure; and

iii. The disclosure made is not for personal gain or interest.

Upon making the disclosure, the Whistleblower's identity will be protected i.e., kept confidential unless otherwise required by law or for purposes or any proceedings by or against the Group.

5.4 An employee making allegations or reports that prove to have been made with bad faith will be subject to disciplinary action. In the case of stakeholders (i.e. suppliers, customers, shareholders, subcontractors or consultants), the continuity of the business relationship shall be reviewed.

5.5 Any form of retaliation undertaken by an Employee against any Whistleblower for reporting any Improper Conduct is prohibited and considered to be in breach of the Group's Policy and Procedures. In such cases, disciplinary measures shall be taken against such Employee.

5.6 A Whistleblower who considers that he/she has been the victim of retaliation for reporting any Improper Conduct or has good reason to believe or fear that he/she is exposed to the risk of retaliation as a result of his/her reporting any Improper Conduct, shall report the matter to the Prescribed Officer and request that protective measures be adopted. The protection against retaliation shall be extended to any other party associated with the Whistleblower.

6. COMMUNICATION AND CONFIDENTIALITY

6.1 All reports and identity of the Whistleblower will be treated confidentially and sensitively. Information relating to the disclosure made by Whistleblower shall be restricted only to those who need to know of the matter, i.e., on a need-to-know basis.

6.2 Any person involved shall be reminded to preserve the confidentiality of the matter.

6.3 Any announcement(s) as required by the regulatory authorities shall be made accordingly in compliance with the disclosure requirements of the relevant regulations.

7. REVIEW OF POLICY

This Policy shall be reviewed, as needed, and may be amended from time to time, as deemed necessary by the Board, to ensure its relevance and effectiveness in keeping with the Group's changing business environment, administrative or operational needs.

DAYANG ENTERPRISE HOLDINGS BHD.

Registration No. 200501030106 (712243-U)

WHISTLEBLOWING FORM

A. PERSONAL DETAILS OF WHISTLEBLOWER

Name as per MyKad/Passport:		Designation:	
MyKad / Passport No.:		Division:	
Gender:		Phone No.:	
Address:		Email:	

B. PERSON(S) INVOLVED IN IMPROPER CONDUCT

Full Name (1):		Relationship:	
MyKad /Passport No.:		Designation:	
Address:		Phone No.:	

Full Name (2):		Relationship:	
MyKad /Passport No.:		Designation:	
Address:		Phone No.:	

WITNESS INFORMATION (IF ANY)

Full Name:		Relationship:	
MyKad /Passport No.:		Designation:	
Address:		Phone No.:	

C. DETAILS OF THE ALLEGATION *(Dayang Group's ability to investigate is limited to the extent of the contents of the report received and should be within Dayang Group's purview)*

Type of Improper Conduct:	

Description of Allegation:

Location:

Date and Time:

Incident/Details of Allegation:

If insufficient space, please continue on the next page.

Description of alleged improper conduct (Continue):

How Incident Was Detected:

Concern and/or Potential Impact of Allegation:

Do you have any other relevant information and/or supporting evidence in the form of printed or handwritten documents, or digital storage media related to this disclosure? Please tick where applicable.

☐ No

☐ Yes, the following are attached and/or provided with this form:

1. ____
2. ____
3. ____
4. ____
5. ____

Declaration :
1. I confirm to the best of my knowledge that all information stated herein is true.
2. I hereby agree that the information provided herein will be used and processed for investigation purposes. I further agree that the information provided herein may be forwarded to a department, authority, or enforcement agency for investigation purposes.

Signature:

____

Date:

Note: No action, suit, prosecution, or other proceeding shall be brought, instituted, or maintained in any court or tribunal against the employee/stakeholder who reports such improper conduct, provided that such acts are performed in good faith.

APPENDIX B: REPORTING PROCESS AND PROCEDURES FLOWCHART FOR WHISTLEBLOWING

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