WHISTLE BLOWING POLICY AND PROCEDURES

1. Introduction

Shinyou Elevator MFG Sdn Bhd and its subsidiaries ("the Group") are committed to the highest standards of integrity, openness, and accountability. The Group encourages all employees and stakeholders ("the Reporting Party") to disclose genuine concerns of improper conduct through formal channels without fear of reprisal or victimization.

2. Objective

The primary objectives of this Whistle Blowing Policy and Procedures ("Policy") are to:

- Encourage the reporting of suspected misconduct without fear of reprisal.
- Ensure all disclosures are managed in a timely, fair, and objective manner.
- Protect the Group's reputation, assets, and legal standing.

The Policy provides a safe and confidential mechanism for any whistleblower to report genuine concerns regarding improper conduct. This includes but is not limited to:-

- Fraud, corruption bribery, theft, embezzlement, or forgery of financial documents.
- Non-compliance with legal obligations or professional standards.
- Misappropriation of Group assets, unauthorised disclosure of proprietary information or profiteering from insider knowledge.
- Acts causing danger to health, safety, or the environment; and workplace grievances such as discrimination, intimidation, abuse of power, sexual harassment or physical abuses.
- Failure to disclose conflict of interest in business transaction involving the Group.
- Any other matter, which cannot be raised by any other procedures.

3. Protection

The Group provides the following safeguards to a Reporting Party, provided the disclosure is made in good faith and based on reasonable belief:

3.1 Confidentiality

The identity of the Reporting Party and details of the disclosure will be kept strictly confidential, unless disclosure is mandated by law or necessary for formal proceedings. The Reporting Party may be required to come forward as a witness in accordance with any applicable laws and/or regulations.

3.2 Protection from Reprisal

The Group prohibits any form of retaliation (disciplinary action, demotion, termination or legal action by the Group) against a whistleblower.

If a report is made in good faith but the investigation finds no wrongdoing, no action will be taken against the Reporting Party. However, any employee found to have made a report in bad faith or with malicious intent will be subjected to disciplinary action and/or legal proceedings by the Company.

3.3. Anonymous Reporting

Reports may be made anonymously. However, the Group encourages parties to provide contact details to facilitate a thorough investigation

4. Reporting Procedure

Concerns should be raised in writing (letter or email) to ensure all details are captured accurately. Report should include details on the nature of the misconduct, dates, location and any supporting evidence.

The report should be directed to:

- **Contact:** Chairman of the Audit Committee
- **Email:** audit.commitee@fuji-shinyou.com

5. Investigation & Resolution Process

The Group follows a structured workflow to ensure impartiality:

(i) Upon receipt of the concern, the Chairman of the Company (as appropriate) will evaluate the report and brief the Chairman of the Audit Committee. If the concern is deemed to have merit, the Chairman will table the matter to the Audit Committee to determine if the claim can be substantiated.

An acknowledgement of receipt will be sent to the Reporting Party within 5-10 working days.

(ii) If a claim is substantiated, an independent Investigation Team, which may include Internal Auditors or such other party deemed appropriate by the Audit Committee, will be appointed.

Any individual implicated in the report is strictly excluded from the investigation and any subsequent decision-making process to ensure impartiality.

The whistleblower's identity is redacted before findings are presented to the team.

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(iii) Upon completion of the inquiry, the Investigation Team will submit a detailed report to the Audit Committee for review. The findings are then categorized to determine the appropriate course of action:

- **Major offense:** (Legal breaches/material financial loss) The Audit Committee recommends a course of action to the Board for deliberation. Board decision are implemented immediately.

- **Minor offense:** (Disciplinary issues) The case is referred to the Human Resources Department for internal inquiry and disciplinary action.

(iv) The Reporting Party will be notified of the outcome of the investigation, subject to legal and confidentiality constraints.

5. Policy Governance

All records, evidence, and findings will be retained securely for a minimum of 7 years in compliance with PDPA 2010.

This policy will be reviewed every 3 years (or annually) by the Audit Committee to ensure effectiveness and legal compliance.