

REDPLANET[®]

REDPLANET BERHAD
REGISTRATION NO.: 201901014292 (1323620-A)

WHISTLEBLOWING POLICY

1. INTRODUCTION

RedPlanet Berhad and its subsidiaries (“RedPlanet Group” or the “Group”) maintain a zero-tolerance approach toward any malpractice, impropriety, statutory non-compliance, or wrongdoing by employees in the course of their work. This Policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud and other irregularities within the Group. It is intended to provide a framework that promotes responsible and secure whistleblowing without fear of adverse consequences.

The Group is committed to the highest possible standards of ethical, moral, and legal business conduct and aims to promote consistent organizational behavior by providing guidelines and assigning responsibilities for the development of controls and the conduct of investigations. In line with the Group’s commitment to open communication and good corporate governance, this Policy also aims to provide a mechanism by which employees and external parties can raise concerns confidentially about any wrongdoing, malpractice, potential irregularities, or fraudulent activities within the Group. It also offers reassurance that individuals who whistle-blow in good faith and without malice will be protected from reprisals or victimization.

Management is responsible for the detection and prevention of fraud, misappropriation, and other irregularities. Fraud is defined as the intentional misrepresentation or concealment of a material fact for the purpose of inducing another to act upon it to their detriment. Each member of the management team must be familiar with the types of improprieties that might occur within their area of responsibility and remain alert for any signs of irregularity.

2. SCOPE

This Policy applies to all directors, officers, and employees, including full-time, part-time, and contract employees of the Group (“Internal Parties”), as well as consultants, vendors, contractors, outside agencies doing business with the Group, employees of such agencies, and/or any other parties with a business relationship with the Group (“External Parties”), whether located in Malaysia or abroad.

3. OBJECTIVE

This Policy aims to:

- Promote corporate integrity and accountability.
- Encourage reporting of unethical or unlawful behaviour.
- Protect whistleblowers from retaliation, in accordance with the Whistleblower Protection Act 2010.
- Define clear procedures for raising and handling concerns.

4. DEFINITIONS

- **Alleged Wrongful Act:** Any action that breaches applicable laws, company policies, or ethical standards.
- **Whistleblower:** An individual who raises concern about suspected or actual wrongdoing, misconduct, or unethical behaviour within or related to the Group.
- **Administrator:** The individual or body designated to receive and manage whistleblowing reports and facilitate the investigation process.
- **Audit and Risk Management Committee:** A committee established by the Board of Directors of RedPlanet Berhad, composed of non-executive directors. It is responsible for overseeing financial reporting, internal controls, compliance, and reviewing whistleblowing matters, especially those involving senior personnel or serious financial misconduct.

5. SCOPE OF REPORTABLE CONCERNS

This Policy is intended to cover concerns related to irregularities, wrongdoing, or malpractice within or involving the Group ("Alleged Wrongful Act"). These may include, but are not limited to, the following:

- Incorrect financial reporting;
- Questionable accounting or auditing practices;
- Unlawful acts;
- Breach of legal obligations;
- Breach of or failure to implement or comply with any Group policy or Code of Conduct;
- Endangerment to the health and safety of individuals;
- Environmental harm or damage;
- Professional or ethical misconduct;
- Concealment of wrongdoings or malpractice;
- Breach of fundamental internal control;
- Impropriety, corruption, fraud, theft, misappropriation or misuse of the Group's property, assets, resources, funds, securities or supplies;
- Acts constituting improper conduct;
- Abuse of power or authority;
- Dishonest or fraudulent behaviour;
- Improper handling or reporting of financial transactions;
- Profiteering from insider knowledge of the Group's activities;
- Unauthorized disclosure of confidential and proprietary information to external parties;
- Acceptance or solicitation of material benefits from contractors, vendors, or service providers (except as permitted under the Group's Anti-Bribery and Corruption Policy);
- Destruction, removal, or inappropriate use of records, furniture, fixtures or equipment;
- Serious conflicts of interest that are not disclosed;
- Acts intended to mislead, deceive, manipulate, coerce or fraudulently influence any internal or external accountant or auditor during financial reviews or audit;
- Serious or improper acts that could cause financial or reputational harm to the Group;
- Violations of this Policy;
- Attempts to conceal any of the above.

6. SAFEGUARDS

6.1 Protection Against Retaliation

The Group strictly prohibits any form of discrimination, retaliation, victimization, or harassment against individuals who, in good faith, report or raise concerns regarding Alleged Wrongful Acts. Retaliatory actions, whether direct or indirect, will not be tolerated and may result in disciplinary or legal action. The Group will take appropriate steps to ensure that whistleblowers do not suffer any detriment as a result of their disclosure.

Victimization may include, but is not limited to, termination, demotion, suspension, disciplinary action, denial of promotion or benefits, unjustified performance reviews, retaliatory investigations, or any form of intimidation or discrimination.

In the course of an investigation, the whistleblower may be required to come forward as a witness. Whistleblowers acting in good faith will not face any consequences, even if the allegations are ultimately unsubstantiated. However, if a report is found to have been made maliciously, frivolously, or for personal gain, the Group reserves the right to take appropriate action, including disciplinary measures or legal referral. Reports intended to pursue personal grievances unrelated to misconduct or non-compliance should be addressed through the appropriate internal channels.

6.2 Confidentiality

All information received under this Policy will be treated with strict confidentiality.

This Policy aims to protect bona fide whistleblowers from any form of unfair treatment. Upon request, reasonable efforts will be made to maintain the confidentiality of the whistleblower's identity, unless disclosure is necessary to ensure a fair and thorough investigation or is otherwise legally required.

Disclosure of the whistleblower's identity or related information may occur in the following exceptional circumstances:

- a) Where there is a legal obligation to disclose such information;
- b) Where the information is already publicly available;
- c) Where disclosure is made in confidence to legal or audit professionals for the purpose of obtaining professional advice;
- d) Where the information is provided to law enforcement or regulatory authorities in the course of a criminal or statutory investigation.

In cases not covered above, where disclosure of the whistleblower's identity is deemed necessary, the Group will make reasonable efforts to notify and consult the whistleblower in advance.

6.3 Anonymous Disclosures

This Policy encourages employees to put their names to allegations, as appropriate follow-up questions and investigations may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated; however, consideration will be given to:

- The seriousness of the allegation;
- The credibility of the information provided; and
- The feasibility of substantiating the claim through independent sources.

6.4 Good Faith and Malicious Reporting

Employees who raise concerns in good faith, even if the allegations are not substantiated upon investigation, will not face any disciplinary action or retaliation. However, any employee found to have made a report maliciously, in bad faith, or with knowledge that the allegation is false or unfounded may be subject to disciplinary proceedings, up to and including termination of employment.

Similarly, if an external party is found to have submitted a complaint with malicious intent or for personal gain, the Group reserves the right to take appropriate action, including legal recourse or referral to law enforcement authorities.

7. REPORTING AND INVESTIGATION PROCEDURES

7.1 Authorisation

The Audit and Risk Management Committee and the Administrator, as authorized by the Audit and Risk Management Committee, shall have unrestricted access to all records, documents, systems, and premises of any company within the Group, whether owned or leased.

They are authorized to examine, copy, or remove any documents, records, or materials deemed relevant to the investigation. This includes, without prior notice or consent, access to storage facilities, files, desks, cabinets, or other repositories, where such access is necessary and within the scope of the investigation.

7.2 Reporting Channels

Concerns or reports of Alleged Wrongful Acts should be emailed to whistleblowing@redplanet.com.my or posted to:

RedPlanet Berhad
Chairman of the Audit and Risk Management Committee
1-8, Level 8, The Boulevard Mid Valley City,
Lingkaran Syed Putra, 59200 Kuala Lumpur, Malaysia.

To preserve confidentiality or anonymity, whistleblowers may submit their report in a sealed envelope clearly marked "**Private and Strictly Confidential**". Such envelopes will be delivered unopened directly to the Chairman of the Audit and Risk Management Committee.

If an employee is not satisfied with the action taken by the Group, or feels unable to report a concern internally, they may escalate the matter to the appropriate regulatory or enforcement authorities in accordance with applicable laws.

7.3 Whistleblower Conduct

To maintain the integrity of the investigation, whistleblowers are advised not to:

- Contact or confront any individual suspected of wrongdoing.
- Attempt to gather evidence or demand restitution.
- Discuss the matter with colleagues, third parties, or any unauthorized persons.
- Conduct their own investigation, interviews, or inquiries.

7.4 Timing

All reports should be made as soon as practicable to allow timely intervention.

7.5 Evidence

A report should be sufficiently detailed, setting out the background and history of events, as well as the reasons for the concern, to enable proper assessment of the Alleged Wrongful Act. Although the whistleblower is not expected to prove the truth of an allegation, they are encouraged to provide any evidence that supports the claim and demonstrates reasonable grounds for concern. If the whistleblower is uncomfortable submitting the report in writing, they may instead arrange a confidential telephone call or in-person meeting with the appropriate officer at a mutually convenient time and location.

7.6 Handling of Complaints

The action taken by the Group will depend on the nature, credibility, and severity of the concern raised. Upon receipt of a report, preliminary inquiries will be conducted to determine whether a full investigation is warranted and, if so, the most appropriate form such an investigation should take. In certain cases, concerns may be resolved without a formal investigation if deemed appropriate.

The Group commits to ensuring that all genuine concerns or information received will be treated seriously and assessed on the following criteria:

- The seriousness of the matter raised;
- The credibility and reliability of the report or information provided;
- The likelihood of verifying the allegation through other sources.

Where an investigation is warranted, the Audit and Risk Management Committee will oversee or direct an independent and impartial investigation, irrespective of the alleged wrongdoer's seniority, tenure, or relationship with the Group.

Throughout the process, appropriate measures will be taken to avoid erroneous accusations, protect the rights of all parties, and ensure confidentiality. Care will also be taken not to alert any individual suspected of misconduct prematurely.

Upon conclusion of the investigation, a comprehensive report detailing the complaint, investigative findings, and recommended actions will be submitted to the Board of Directors for review and further decision-making.

7.7 Feedback to Whistleblower

Subject to legal requirements and the needs of the investigation, the whistleblower will be provided, within two (2) weeks of submitting the report, with follow-up information that may include:

- Acknowledgement of receipt of the complaint;
- An outline of how the matter will be handled;
- An estimated timeframe for further updates or a final response;
- Confirmation of whether preliminary inquiries have been made;
- General information about the outcome of the investigation (where appropriate);
- An explanation if no further action is to be taken.

To protect the rights and reputations of all parties and to mitigate potential civil liability to the Group, detailed investigation findings will not be disclosed beyond those who have a legitimate need to know.

7.8 Further Information

The level of communication between the whistleblower and the investigating body will depend on the nature of the concern and the clarity of the information provided. Additional information may be requested from the whistleblower if necessary.

Subject to legal constraints and the nature of the investigation, the whistleblower will be kept informed about the outcome of the investigation, as appropriate.

8. MONITORING OF INVESTIGATIONS AND COMPLAINTS

Upon receipt of a complaint, the Administrator shall:

- a) Determine whether the matter falls within the scope of this Policy and assess if an investigation is warranted;
- b) Investigate the matter directly, refer it to Management, or escalate it to the Audit and Risk Management Committee for investigation.

The Administrator shall maintain a comprehensive record of all complaints received, including actions taken. This record shall be submitted to the Audit and Risk Management Committee during scheduled meetings for review.

The Audit and Risk Management Committee shall evaluate the report and direct any further necessary actions.

If deemed appropriate, the Administrator shall immediately provide the Chairman of the Audit and Risk Management Committee with detailed information about the complaint.

The Audit and Risk Management Committee, with the support of the Administrator, will keep a record of complaints filed under this Policy, noting actions taken and outcomes. Records will be anonymised when necessary to protect confidentiality and the identity of the whistleblower. These records will be reported to the Board of Directors.

Decisions regarding prosecution or referral to law enforcement and/or regulatory authorities may be made in consultation with legal counsel and Management, as necessary. The final decision on case disposition rests with the Board.

Decisions related to employee termination may be made in consultation with Human Resources, Management, and legal counsel. The final decision on such matters also lies with the Board.

9. MONITORING AND REVIEW

- i) All employees and relevant stakeholders are responsible for supporting the effectiveness of this Policy by reporting any suspected wrongdoing or misconduct in good faith.
- ii) The Group will periodically review this Policy and make necessary revisions to ensure it remains effective, current, and in compliance with applicable legal and regulatory requirements.
- iii) This Policy was adopted by the Board on 28 January 2026 and is made available on the Company's website at <https://redplanetgrp.com/>.

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