



## **Whistle-Blowing Policy**

Document Number: LACMED-POL-P21

Revision Number: 0

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# LAC MED BERHAD


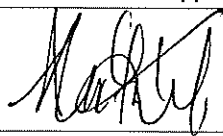
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## Whistle-Blowing Policy

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### REVISION HISTORY

Rev.	Effective Date	Description of Changes
0	9/05/2025	New Issue

	Prepared By	Approved By
Signature		
Name	Thean Yain Peng	Liew Yoon Kit
Designation	Chief Financial Officer	Non-Independent Non-Executive Chairman

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LAC Med Berhad and its group of subsidiary companies ("LAC Group" or "the Group") is committed to conducting the Group businesses with honesty and integrity. LAC Group expect all employees (including temporary and contract employees), officers, interns, secondees acting in the Group's subsidiary companies name to maintain high standards and to uphold the values and behaviours in accordance with the Group's Code of Business Conduct and Ethics.

As such, the Board of Directors of LAC Med Berhad ("the Board") has formulated this Whistle-blowing Policy to protect the values of transparency, integrity, impartiality and accountability in which the Group conduct their businesses and affairs.

The purpose of this Policy is to encourage the reporting of any form of inappropriate behaviour (excluding Human Resource disciplinary matters) and provide guidance on how to raise concerns.

The Whistle-blowing Policy encompasses the following:

- Govern the process where employees and others may report potential violations or concerns relating to relevant laws, rules, regulations, business ethics and conducts, including any violations or concerns relating to illegal, embezzlement and fraudulent activities;
- Establish a mechanism for responding to any reports from employees and others regarding such potential violations or concerns;
- Prohibit retaliation against employees raising such potential violations or concerns; and
- Establish guidelines for the retention of records and reports.

Employees who blow the whistle on wrongdoings will be protected against victimisation or other adverse treatment provided that the Whistle-blowing is done in good faith. Confidentiality will be maintained and genuine concerns reported honestly can be raised without fear of retaliation by the whistleblower. However, any Whistle-blowing which is not made in good faith and is found to be deliberately falsified with malicious intent will be subjected to disciplinary action accordingly.

All employees of LAC Group must follow this Whistle-blowing Policy and cooperate with any review and investigation initiated pursuant to this policy.

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The Board is overall responsible for the Whistle-blowing Policy. The administration and implementation of the policy is to be carried out under the Head of Internal Audit and Risk Management ("HIARM").

## **WHISTLEBLOWING GUIDELINES**

### **1. DEFINITION**

- 1.1 The word Whistle-blowing in the context of this Whistle-blowing Guidelines ("Guideline") refers to the situation where a person (internal or external) raises serious concerns at an early stage about risks of wrongful activities or reports of wrongdoing.
- 1.2 A Whistle-blower is defined as an employee, officer, intern, secondee or agent of the Group who reports or discloses information on breaches, wrongful doings discovered in the context of his or her work-related activities. A whistle-blower may elect to remain anonymous but he/she must report on a named and confidential basis.
- 1.3 For purpose of this Guideline, the wrongful activities and wrongdoings refer to any potential violations or concerns relating to any laws, rules, regulations, business ethics, Anti-Bribery & Corruption Policy and Code of Business Conduct and Ethics, including any violations or concerns relating to illegal, immoral, embezzlement and fraudulent activities.

### **2. OBJECTIVE**

- 2.1. The objective of the Whistle-blowing Policy and Guidelines is to protect the values of transparency, integrity, governance, impartiality and accountability in which the Group conducts their businesses and affairs.

### **3. WHAT TO REPORT**

- 3.1. This Guideline applies to all employees of the LAC Group.
- 3.2. This Guideline will not apply to personal grievances concerning an individual's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying or harassment, or disciplinary matters. Any complaints related to the human resource matters

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will be escalated to the Human Resource Department and to be dealt with under the existing Code of Conduct and Ethics.

- 3.3. The following are considered to be examples of concerns which can be raised (not exhaustive); any suspected fraudulent conduct, corrupt conduct, violation of any personal data protection and company system security rules, endangerment of individual health and safety or environment, commission of criminal offense, non-compliance with any legal or regulatory obligation and concealment of any information pertaining to any of the above.

#### **4. HOW TO REPORT**

- 4.1. The Whistle-blower should report directly either to HIARM or Group Chief Executive Officer or any of the Board members or any of the Audit and Risk Management Committee members.
- 4.2. Concerns can be raised in writing or orally (by telephone or voice messaging system) and upon request by the person raising the report by means of physical meeting within a reasonable timeframe.
- 4.3. The HIARM will maintain the records of reports or potential violations and actions taken through the case management system.
- 4.4. The Management of Integrity Taskforce which comprise of the Group Chief Executive Officer, Chief Financial Officer, HIARM will review all the reports made and recommend the next course of action to be taken.
- 4.5. The Whistle-blower will not be expected to prove the truth of an allegation but must be able to demonstrate that there are sufficient grounds to have reasonable belief of the alleged concerns raised.
- 4.6. If the Whistle-blower is uncertain whether the particular act or concern constitutes wrongdoings under this Guideline, he/she is encouraged to contact the HIARM for clarification before making a formal complaint.

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## 5. CONFIDENTIALITY

- 5.1. LAC Group will take every reasonable precaution to keep the identity of the Whistle-blower confidential, consistent with conducting a thorough and fair investigation and compliance with applicable laws.
- 5.2. Access to any report will only be permitted to any staff who necessarily must be aware of the report.
- 5.3. The Whistle-blower identity will not be disclosed without explicit consent to anyone beyond the staff who receive and follow up on the report.

## 6. PROCEDURES OF INVESTIGATION

- 6.1. All reports of concerns falling under this policy will be acknowledged no later than seven (7) days after receipt.
- 6.2. Complaints will be investigated promptly, impartially and appropriately within the investigative guidelines to be determined by the Management of Integrity Taskforce.
- 6.3. The Whistle-blower should include all details of his/her concerns as much as possible; i.e. nature of wrongdoing, date of incidence, time and place of occurrence, identity of alleged wrongdoer, particulars of witness (if any), production of documentary evidence (if any) and other details deemed to be useful to facilitate screening and action to be taken.
- 6.4. The Whistle-blower will be asked to provide further clarification/information when required.
- 6.5. The investigation will be carried out under the terms of strict confidentiality. The Whistle-blower and the alleged wrongdoer are expected to give their full cooperation in any investigation or any other process carried out.
- 6.6. Determination of findings will be reviewed by the Management of Integrity Taskforce and appropriate action will be taken as required.

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## 7. PROTECTION

- 7.1. LAC Group is committed to ensuring the Whistle-blower is not disadvantaged in any way by validly raising concerns about suspected reportable behaviour provided that they had reasonable grounds to believe the information was true and accurate at time of reporting. Identity of Whistle-blower is protected as well as he/she is protected from harassment or victimisation as a consequence of his/her disclosure.
- 7.2. If at any time it is discovered the Whistle-blower knowingly raised false accusation, he/she will lose the protection granted under this Guideline and will be subjected to Human Resource disciplinary actions.

## 8. CIRCULATION AND FEEDBACK

- 8.1. The Whistle-blowing Policy and Guidelines will be informed and made available to all employees of the Group.
- 8.2. The Whistle-blower where appropriate may be notified on the decision of the investigation. As the Group strives to maintain confidentiality in all investigations, it may not be able to inform the Whistle-blower details of the investigation and any disciplinary actions taken as a result.

The Group reserve the rights to amend and revise the contents of this policy and guidelines at any time. Amendments may be required where there is a change in the way which LAC Group operate due to market conditions or change in legislations.

All employees, officers, interns, secondees and agents should ensure that they act in accordance with the objective and purpose included in this Policy.