

Synergy House Bhd. Whistleblowing Policy

1.0 Introduction

- 1.1 SYNERGY HOUSE BERHAD Group of Companies ("the Group") is committed to maintaining the highest standards of integrity, transparency, and accountability.
- 1.2 This Whistleblowing Policy provides a structured mechanism for employees, stakeholders, and third parties to report misconduct without fear of retaliation. The policy aligns with Bursa Malaysia Listing Requirements, the Malaysian Code on Corporate Governance (MCCG), and applicable laws.

2.0 Purpose

- 2.1 This policy aims to
 - 2.1.1 Encourage employees and stakeholders to report actual or suspected misconduct.
 - 2.1.2 Provide a secure and confidential reporting mechanism.
 - 2.1.3 Protect whistleblowers from retaliation or victimization.
 - 2.1.4 Ensure thorough investigation and corrective actions when necessary.

3.0 Scope

- 3.1 This policy applies to all employees, directors, business partners, suppliers, and stakeholders. Reports may include, but are not limited to
 - 3.1.1 Fraud, corruption, or bribery.
 - 3.1.2 Financial mismanagement or accounting irregularities.
 - 3.1.3 Abuse of power, conflict of interest, or unethical behaviours.
 - 3.1.4 Harassment, discrimination, or workplace misconduct.
 - 3.1.5 Violation of laws, regulations, or company policies.

4.0 Responsibilities

4.1 Employees & Stakeholders

- 4.1.1 Encouraged to report any suspected wrongdoing.

4.2 Investigation Team

- 4.2.1 Responsible for reviewing and investigating reports while ensuring impartiality and confidentiality.

4.3 Board of Directors & Audit Committee

4.3.1 Oversee policy implementation and effectiveness.

5.0 Whistleblower Protection

5.1 Whistleblowers who report in good faith will be protected from retaliation, discrimination, or adverse employment consequences. The Group ensures confidentiality and will not disclose the whistleblower's identity without consent, except as required by law. Reports made maliciously or with false information may result in disciplinary action.

6.0 Reporting Channels

6.1 Concerns may be reported confidentially via email to **whistleblower@synergy-house.com**, with the subject line marked 'Strictly Confidential'. The recipient of this email is the Audit Committee of Synergy House Berhad.

7.0 Investigation Process

7.1 Acknowledgment, and delegation

7.1.1 The Audit Committee will assign an investigator from the top management team depending on circumstances.

7.2 Assessment

7.2.1 The Investigation Team as assigned by the Audit Committee, will assess the report to determine its validity and the need for further investigation. The investigator needs to be impartial and independent to all parties concerned and have a duty of fairness, objectivity, ethical and observe legal and professional standards.

7.3 Investigation

7.3.1 A formal investigation will be conducted if necessary, maintaining strict confidentiality.

7.4 Outcome & Action

7.4.1 If misconduct is found, the findings will be reported to the Audit Committee and appropriate disciplinary or legal actions will be taken.

7.5 Feedback to Whistleblower

- 7.5.1 The whistleblower will be informed of the outcome within three (3) months, where legally permissible.

8.0 Case of Doubt

- 8.1 If an employee or stakeholder is uncertain whether a situation constitutes misconduct under this policy, they are encouraged to seek guidance from their supervisor, HR Manager, or Internal Control Officer before proceeding with a report. It is always advisable to err on the side of caution and report any concerns to ensure compliance with ethical standards.

9.0 Monitoring and Review

- 9.1 This policy will be reviewed every January or as needed to ensure adherence to laws, regulations, and best practices.

10.0 Approval

- 10.1 This policy is approved by the Board of Directors on 17/04/2025.