



TEXCHEM RESOURCES BHD
[Reg. No.: 197301002868 (16318-K)]

WHISTLEBLOWER POLICY

1. Purpose

- 1.1 Texchem Resources Bhd and its subsidiaries (“Texchem”) are dedicated to maintaining a culture of transparency, accountability and integrity.
- 1.2 This Whistleblower Policy (“Policy”) provides a safe and confidential avenue for employees, stakeholders and third parties to report any unethical behavior, misconduct or violations of the law within Texchem. Texchem aims to encourage reporting without fear of retaliation .

2. Scope

- 2.1 This Policy provides an avenue for all employees of Texchem and members of the public to disclose any improper conduct through internal channel. Such improper conduct includes the following:
 - (a) Fraud, corruption or bribery;
 - (b) Financial mismanagement or fraudulent accounting;
 - (c) Violation of company policies, including health and safety guidelines;
 - (d) Unlawful activities or criminal conduct;
 - (e) Breaches of confidentiality obligation or conflict of interest;
 - (f) Misuse of company resources; and
 - (g) Any other unethical behaviour or misconduct.

3. Reporting Procedure

- 3.1 Whistleblowers may report either anonymously or openly by submitting the completed Report of Improper Conduct attached as Appendix A in this Policy (“Report”) through the following dedicated channels:
 - (a) **E-mail:** esg@trbgroup.com; or

- (b) **Mail:** Whistleblower Committee, Level 18, Menara Boustead Penang, 39, Jalan Sultan Ahmad Shah, 10050 Penang, Malaysia. The Report shall be submitted in a sealed envelope marked as “Confidential”.

4. Protection of Whistleblowers

4.1 Texchem provides comprehensive protection to whistleblowers, including:

- (a) **Confidentiality:** The identity of the whistleblower will be kept confidential throughout the investigation process to the extent reasonably practicable unless disclosure is required by law.
- (b) **No Retaliation:** Whistleblowers will be protected from any form of retaliation, harassment, demotion or other adverse employment actions resulting from their report.
- (c) **Protection for Anonymous Whistleblowers:** Anonymous whistleblowers will be given the same protection and no attempt will be made to identify them unless necessary.

5. Investigation process

- 5.1 **Initial Review:** Upon receiving a report, the Whistleblower Committee will conduct a preliminary review to assess its credibility and determine if further investigation is warranted.
- 5.2 **Investigation:** A thorough and impartial investigation will be conducted by an appropriate team based on the severity of the case. The investigating team may involve internal auditors, legal counsel or external professionals depending on the nature and subject matter of the Report. The investigation will follow a structured process, ensuring fairness and confidentiality at all stages.
- 5.3 **Timeline:** Investigations will be initiated within 5 working days upon receiving the report, with a commitment to resolve most cases within 30 days. In more complex cases, updates will be provided to the whistleblower (if identified) on the progress of investigation.
- 5.4 **Findings:** The findings will be presented to the Board of Directors or Senior Management, depending on the severity of the improper conduct. Corrective actions or disciplinary measures will be taken where the report is substantiated.

6. Good faith and false claims

- 6.1 Whistleblowers are expected to report any concerns in good faith, based on genuine belief and without malice for the best interest of Texchem and not for personal gain or motivation.

- 6.2 Any individual who is found to have intentionally made false or malicious allegations may face disciplinary action, including termination or legal consequences.

7. Responsibility and review

- 7.1 The Board of Directors and Senior Management are responsible for overseeing the implementation of this Policy and ensuring adherence.
- 7.2 Texchem is committed to ensuring continuous improvement in its whistleblowing procedures and upholds its commitment to the highest corporate governance standards.
- 7.3 This Policy will be reviewed periodically to remain aligned with current laws, regulations and best practices.

[End]



CONFIDENTIAL

Report of Improper Conduct

Your Contact Information

Name _____

NRIC No. _____

Phone No. Office _____ Mobile _____

Home _____

E-mail Address* _____

For employees only:
Employment details _____

Position & department _____

Your Disclosure

Please include details of the person(s) involved, nature of allegation, where and when the alleged improper conduct took place (use additional sheets if necessary)

Please state the supporting documents, witnesses or evidence to substantiate your disclosure (if any) to facilitate investigation. You may also attach the relevant documents (use additional sheets if necessary)

Declaration

1. I hereby declare that all the information given herein are made voluntarily and are true to the best of my knowledge.
2. I fully understand that in the event I have made this disclosure maliciously or in bad faith, the whistleblower protection contained in the Whistleblower Policy will no longer be applicable to me.
3. I consent to Texchem disclosing, collecting, storing, processing and using the information and material provided including my personal data for the purpose of investigating, reviewing and evaluating my disclosure and taking any action in connection therewith.

(Signature*)

Name

Date